

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Elliot M. Hirsch,

Plaintiff,

Civil Action No. 21-12246 (FLW)

v.

**Amended Complaint and Demand
for jury trial**

Laurie Beda, Betti Missry, Norma Tawil, Heshy Tischler

Amber Adler, Yeshiva of Flatbush Joel Braverman High School, Elisheva Yarimi and Adina Miles

Defendants

INTRODUCTION

1. Plaintiff Pro Se, Elliot M. Hirsch, brings this action against Laurie Beda, Betti Missry, Norma Tawil, Heshy Tischler, Amber Adler, Yeshiva of Flatbush Joel Braverman High School, Elisheva Yarimi and Adina Miles for their intentional malicious harassment and defamatory campaign against me. The allegations herein of Plaintiff are based upon personal knowledge and belief as to his own acts and upon information and belief as to all other matters.

2. The reason the above-named individuals and entities engaged in these malicious/criminal acts was in order to severely oppress, harass and intimidate me so that I grant my wife a Jewish divorce, otherwise known in Hebrew as a GET.

3. In essence, the Defendants conspired to oppress, threaten, and intimidate me in the free exercise or enjoyment of my right of freedom of religion secured to me by the

Constitution of the United States. I was faced with a credible threat of daily violent mob rioters coming to my personal home dumping leaflets, garbage bags, egg throwing and property destruction unless I gave my wife a GET.

4. According to Orthodox Jewish law, which all of the Defendants appear to adhere to, for a *GET* to be valid a husband must grant it to his wife of his own free will. Only under very limited circumstances may a Jewish Rabbinic Court engage in coercive methods so that a man gives his wife a *GET*. Otherwise, a GET given due to coercion will be deemed invalid.¹ It is submitted that in my particular case, multiple *Beth Din*'s, the Hebrew term for Rabbinic Court, issued written statements that it was forbidden to pressure me to give my wife a GET. Accordingly, it is apparent that the Defendants actions are not in accordance with Orthodox Judaism and do not reflect true Orthodox Judaic principles. Moreover, according to several expert Rabbis in the field of Jewish Divorce law, I gave my wife what is called a *GET MEUSEH*, the Hebrew term for "forced get". And said GET was rendered null and void by said Rabbis.

5. On March 11, 2021, in Brooklyn, NY, at approximately 8:20pm, I gave my wife a GET.

6. I expressly stated to the Rabbis who presided over the GET proceedings that I was giving this GET in order to, *inter alia*, stave off a mob of 500-700 people from coming to my residence in Oakhurst, NJ(my father owns this home) and my parents' home in Brooklyn, NY, the latter being a home I spend much time in as my parenting time with my daughter usually occurs there since the Supreme Court of New York, Justice Joanne D. Quinones, forces me to

¹ See <https://www.jlaw.com/Articles/getart3.html>, The New York State Get Bill and its Halachic Ramifications Rabbi Chaim Malinowit

come into Brooklyn for all visitations over my objection that it's patently unfair not to have an equidistant exchange location.

7. I expressly stipulated with the Beth Din that presided over the GET proceedings; namely, Rabbi Yitzchak Yisraeli of the Sephardic Center of Mill Basin, Brooklyn, NY, that a video must be circulated on social media immediately after I gave the GET advising the public that I gave a GET and that the mob of protestors and harassers cease all activity towards me and my family.

8. The Rabbis agreed to my request and a video was posted online and there was no riot at any of my parents' home since then. Over the next couple of weeks, the mob violently harassed several other "get deniers" or "get refusers" as they call us, via death threat texts, illegal protesters, and harassment at the JFK International Airport.

9. I further advised the Rabbis at the GET that I was receiving threatening messages of violence from dozens of random people and that we needed to finish the GET proceedings before 830pm as the mob was preparing to surround my parents' home at 1861 East 22nd Brooklyn, NY 11229. I have audio recordings of the GET proceedings which I would be able to produce at trial that verify all of my factual allegations.

10. In total, the Defendants committed criminal acts and civil torts under the facade of Orthodox Jewish religious activism. This is the main reason they were able to gain the popularity of the masses and incite such violent hatred and disorderly conduct towards me and my family; namely, they created the impression that they were acting in the name of justice. However, the acts perpetrated against me were nothing short of illegal, both criminally and civilly and both according to State and Jewish law.

11. Laurie Beda is the sister of Evelyn Kairey, the mother of my wife, Elizabeth Marcelle Kairey(because the GET has been declared invalid by various Rabbis who are experts in Jewish Divorce law, Elizabeth Kairey is both my wife according to Jewish and New York State law.)

12. Norma Tawil is the daughter of Laurie Beda.

13. Betti Missry is the daughter of Laurie Beda.

14. Amber Adler and Heshy Tischler are public figures that were running for New York City Council 48th district. Both potential councils lost the election. Additionally, according to google search, Heshy Tischler has a criminal history.

14. Elisheva Yarimi is a woman who has circa 12,000 Instagram followers.

15. Yeshiva of Flatbush Joel Braverman High School is a high school located in Brooklyn, NY with the vast majority of its students belonging to the Syrian Jewish Community of Brooklyn, NY. Additionally, I am a former student at the Yeshiva of Flatbush from 5th grade through the end of high school. Accordingly, the Yeshiva is well aware of my ADHD condition, which will be discussed below in the damages portion of this complaint.

16. Adina Miles is a self-proclaimed “Jewish Feminist/activist”. She has over 50,000 followers on Instagram.

17. Elizabeth Marcelle Kairey is my wife. We have one daughter together: namely, Paulette Rosa Hirsch born October 9, 2016. My wife and I got married in a religious ceremony in Brooklyn, New York on November 5, 2013. My wife filed for divorce in New York Supreme Court on June 26, 2018. Her attorney was Maxine Donskoi at the time. She had a prior attorney

named Gregory Rabinowitz whom she subsequently fired. Currently my wife is represented by Jay R. Buttermann in our divorce action in New York. Jay R. Buttermann is a high-priced attorney at the “courtesy rate” of \$550 an hour. When my wife and I had litigated in New Jersey my wife was represented by Alison Ansel of Ansel and Grim who is also a high-priced matrimonial attorney. Accordingly, as my wife has been viciously litigating against me the last four years with extremely experienced matrimonial attorneys, for the vast majority of the litigation, I have had to defend myself Pro se as I simply do not have the financial ability to hire attorneys to represent me. I have been without full time employment since June 2016 only part time working as an Uber Driver throughout law school. Currently I have no job and I have no choice but to submit this complaint as a Pro se Plaintiff.

18. Various members of the affluent Syrian Jewish community have been funding my wife’s litigation expenses and now because of the Defendants actions my wife got infused with a \$128,000 lump sum payment to continue her offensive lawsuit against me in New York Supreme Court. Under no circumstance is Elizabeth Kairey obligated to sue me for divorce. She did so on her own accord and her campaign against me, which will be described in detail in the forthcoming complaint, was phrased in a way that made it appear as though I was the one who was forcing her to litigate. I ask this Court to punish the Defendants with great severity as their actions were wanton, malicious, and caused me permanent reputation and emotional damage.

JURISDICTION AND VENUE

19. Plaintiff brings this suit pursuant to 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, which is a diversity jurisdiction case. Plaintiff also brings this suit pursuant to 42 U.S.

Code § 1985. Conspiracy to interfere with civil rights which is a federal law claim 28 U.S. Code § 1331.

20. Venue is proper pursuant to 28 U.S.C. § 1391(b)(2).

PARTIES

21. Plaintiff, Elliot M. Hirsch, resides at 7 Saxony Drive, Oakhurst, New Jersey 07755. Plaintiff's telephone number is 917 750 0418 and email address is Elliothirschlaw@gmail.com.

22. Defendant Laurie Beda permanently resides at 441 Quentin Road, Brooklyn, NY 11223, Defendant Norma Tawil resides at 2039 East 8th street, Brooklyn, NY 11223, Defendant Betti Missry resides at 25 South Elberon Sq, Long Branch, NJ 07740. Defendant Amber Adler permanently resides at 1775 east 13th street Apt# 5F, Brooklyn, New York 11229. Defendant, Heshy Tischler's business address is 5318 16th ave, Brooklyn, New York, 11204. Defendant Elisheva Yarimi resides at 1452 E 12th St, Brooklyn NY 11230. Defendant Yeshiva of Flatbush Joel Braverman High School is located at 1609 Ave J, Brooklyn, New York 11230. Defendant Adina Miles resides at 1416 E 16th St, Brooklyn, NY 11230-6608.

STATEMENT OF CLAIM

23. The incidents that give rise to this action took place on Instagram on March 8, 9, 10, and 11 in the year 2021 and in Brooklyn, NY, on the corner of Ave P and Kings Highway at Ocean Ave, adjacent to a park named "Corporal Wiltshire Park" on March 11, 2021, at circa 12:00pm. I was not present at the physical gathering at said park, however, the threatening messages that were made at the illegal protest and on Instagram were sent to me via electronic means; namely, Instagram and WhatsApp, while I was present in the State of New Jersey at my

residence. Accordingly, a substantial part of the events giving rise to this claim occurred in this Court's jurisdiction. Additionally, many of the defamatory comments made about me still exist on the internet to this date.

FACTS

24. This Honorable Court advised me to consolidate this complaint against said Defendants because the Court determined that the "[c]omplaints concern the same conduct and arise under the same set of factual circumstances". Being that this Honorable Court determined that jurisdiction is proper here I have added Defendants that participated in the same factual circumstances that give rise to this complaint.

I. DEFENDANT LAURIE BEDA

25. Laurie Beda had(and still has) an Instagram account under the name "lauriebeda".

26. Laurie Beda has(and still has) a picture of her and her husband, Leon Beda, as her icon photo.

27. As of the time of the first complaint filed here in this Court, Laurie Beda still had posted on her Instagram page a link to a website called "the chesed fund". The exact link she posted was <https://thechesedfund.com/jacobskassinchesedfund/freeelizabeth>. Attached hereto as Exhibit the Court will be able to see the post(the rest of the link does not fit on the Instagram page, but I retain a video where the Court will be able to see the full link address as I screen recorded myself clicking the link and showing where it leads to in google chrome).

28. The webpage that Laurie Beda posted on her page was a “charity” campaign for my wife Elizabeth Kairey. Said webpage was taken down quickly after my wife was able to gather approximately \$128,000 in less than 48 hours.

29. On the webpage a picture was posted of my wife Elizabeth Kairey adjacent to our daughter, whose face was blotted out(I found that offensive). Obviously, the purpose of the picture posted was to draw public sympathy for Elizabeth as she is single mother by choice as I did not file for divorce and in fact offered to stay married and support Elizabeth Kairey and our daughter.

30. Said webpage was published on March 8, 2021, on the Chesed Fund organization and created by a Jewish Synagogue called Edmond J. Safra Synagogue located in Brooklyn, NY. My wife and her family are members of said synagogue. A separate action will likely be commenced against the Synagogue in District Court of New York as I believe the claims against them will likely fall under the jurisdiction of New York State.

31. On said webpage my name was stated throughout the comments section posted on the webpage and referenced me as “he” throughout the description on the webpage. It is indisputable that I was the subject of the description on the webpage.

32. The way the Chesed Fund website works is that the comments section is completely controlled by the person/organization that created this website. So, if a person posts a comment(they must donate at least \$1 in order to comment), the webpage creator can either leave the comment or delete it.

33. Accordingly, the webpage creator and those that published its content, such as Laurie Beda, should be held accountable for all comments that were made and left on the website.

34. Several comments posted contained threats of violence and inciting hatred towards me and my family and thereafter the webpage creator posted a disclaimer to its viewers to not post negative comments and deleted all the threatening posts but only after most of the money was collected and the damage to my reputation was done.

35. Thereafter, the website creator disabled the feature of people being allowed to comment.

36. Once the website campaign reached circa \$128,000 they shut down the ability to donate. Soon thereafter, the website was rendered defunct.

37. Attached hereto as Exhibit is evidence of the webpage.

38. The website stated, *inter alia*, that I never paid “any” child support. Said statement of fact is false as I can provide evidence to this Court that I have provided child support to Elizabeth Kairey.

39. The website also stated that I appealed every decision of the civil court(referencing the divorce action between Elizabeth Kairey and Elliot Hirsch index number 53206/2018 in Supreme Court Kings County). Said statement of fact is false and this Court can confirm that with the Supreme Court of New York and the Supreme Court Appellate Division 2nd Department. Moreover, in context, said statement of fact was intended to damage my reputation and incite hatred towards me.

40. Comments were made on this website stating, “let’s make a physical gathering and get the get”. Another comment posted stated “ wow, let’s do that, good idea, he’ll regret every day he held her back, Where do we go? He’ll get scared and give it(the GET) immediately.” Even the people involved with this harassment campaign knew that I would not be able to withstand the intense humiliation and intimidation.

41. A comment stated “elliot you are evil”. Another comment stated, “boycott Dr. Jonathan Hirsch”.

42. Over 1000 people donated to this webpage.

43. To emphasize the spuriousness of the comments section on this website, there was a donation in the name of Stuart Husney and Elliot Hersch(spelling my name wrong). I can testify under oath that I did not donate to this campaign and Stuart Husney, who is my mother’s brother, also did not donate to this campaign webpage. Accordingly, there were people obviously falsely stating names of donators in order to further their objective that even my family members were opposed to me and did not support me in my refusal to give my wife a GET.

44. There were comments posted by people that were truthful as one post was made by my former best friend’s sister Vicky Mizrahi stating that it was my former best friend’s wish that I give my wife a GET. My former best friend, Elliot J. Dabah, died November 2020 from a drug overdose and he did in fact send me messages about 6 months prior to his death advising me to give my wife a GET.

45. My wife’s attorney Jay R. Buttermann has recently confirmed that his client received the money and approved the webpage. Accordingly, there is no doubt that this webpage was created to fund my wife’s litigation expenses in her current lawsuit against me in Supreme

Court Kings County and that I was the subject of the defamation. I would supply as Exhibits the documents proving my wife has received the money, but the documents could be construed as confidential and not permitted to be viewed by the public and from what I understand this complaint is available to the public.

46. It is important to note that I did advise Judge Joanne D. Quinones, our current Justice in the divorce action, about the webpage and its contents prior to the illegal protests. She refused to issue a temporary order of protection against my wife, which I was requesting, including a no third-party contact provision.

47. On March 10, 2021, Laurie Beda, engaged in a deliberate malicious campaign of harassment and intimidation via Instagram posts she made on her main page and on what Instagram calls a “live video”. Said posts galvanized a mob of illegal protestors to come riot and protest outside my home at 7 Saxony Drive Oakhurst, NJ 07755 on March 10, 2021, and my father’s medical practice on March 11, 2021, located at 2136 Ocean Ave, Brooklyn, NY 11229. The protestors were busy protesting a different man the previous two nights in Brooklyn, New York.

48. On March 8, 2021, and on March 9, 2021, a mob of illegal protestors from the Jewish Syrian enclave of Brooklyn, New York gathered at around 830pm in Brooklyn, New York on East 5th street between Ave T and Ave U in order to intimidate a man named Dibo Hafif to give his wife a GET.

49. Said mob was extremely riotous and there is video evidence that police presence, which was very few in number, were unable and did not even attempt to disperse the protests. In the video there is only one police car and approximately 500-700 people blocking street traffic

and throwing eggs at Dibo's house. The mob also destroyed the air conditioning units on Dibo's property. Upon information and belief, the mob did not leave until 2am.

50. On video evidence I can present to this Court, the mob is seen throwing eggs at this man's home. The NYPD 61st precinct barely had any officers present at this protest. It is unknown why the NYPD did not properly disperse the illegal protest. The reason I say this protest was illegal is because the protest was organized the same day it occurred.

51. At the time the protests were held the New York City rules per the 311-website stated that permits are required for people to protest. Specifically, permits are required when loudspeakers are used and when public streets are blocked. Both, loudspeakers, and protestors blocking street access, occurred at this protest, and upon information and belief, the protestors had no permits. This Court would be able to ascertain whether or not the protestors had proper permits.

52. The following day March 10, 2021, a man named Abraham Manopla, who has an Instagram account named "MEXICANPACINO0528", acted as one of the leaders of this mob by entertaining over 700 plus viewers on an Instagram live video, which is a feature of Instagram, which allows users to commence a live video and have guests come on the video and the public is able to comment on the video and all those viewing the live video are able to see the comments.

53. Mr. Manopla was convincing and urging the crowd watching his video to go to this man Dibo Hafif's home again that night March 10, 2021. The previous day Manopla successfully incited a riot at Dibo's home. The reason Mr. Manopla was urging people to go to

Dibo's house was because Dibo Hafif had, allegedly, not given his wife a *GET* for over 17 years and they wanted to intimidate Dibo to give his wife a *GET*.

54. Dibo's wife, Evet Hafif, was a guest on Mr. Manopla's show the previous day and urged the people to attend the protest outside her ex-husbands home.

55. On March 10, 2021, during another Instagram live video Mr. Manopla commenced, which he labeled "peaceful protest", Laurie Beda, made numerous posts/comments on this live video, which had approximately 800 people viewing it(Instagram shows the amount of people watching a "live video".)

56. Laurie Beda's username on Instagram is her name "lauriebeda". Moreover, she has a picture of herself and her husband as her icon. Unquestionably the comments were made by Laurie Beda.

57. There is no doubt that Laurie Beda is the person who made the comments on the live video entitled "peaceful protest". There is also no doubt that Laurie Beda was in direct contact with my wife Elizabeth Kairey who was informing her whether or not I had given her the *GET*. Elizabeth Kairey's culpability for the protests that occurred at my home and father's business will be addressed in a separate lawsuit.

58. Laurie Beda made the following comments on this live video titled "peaceful protest"(the protest was deemed NOT peaceful by the Ocean Township Police Dep.)

- A Don't forget Elizabeth! Hirsch is playing you. There is no positive movement.
- B. Blast this to hirsch.
- C. I am credible.

59. Here are some of the other comments people made on the live video that give Laurie Beda's comments more context:

- A. Laurie Beda is credible. She says no movement.
- B. Is he home guys?
- C. Beating
- D. Go to Hirsch house.
- E. Wherever he is. We got peeps.
- F. Yes share his number. Let's raise Hell.
- G. Lets go 7 Saxony Dr. tonight.
- H. There is no movement.
- I. Well boat his phone
- J. Yes share his number. Lets raise hell.
- K. 7 Saxony tonight. We going raw

60. I was able to download most of the live video that was titled "peaceful protest". However, the comments people make during the live video do not get saved on Instagram. But I received screenshots of the above-mentioned comments from people who sent me them via WhatsApp. The people sent me these screenshots because Laurie Beda advised the crowd to "blast this to hirsch". And indeed, I received the threatening messages from numerous people.

61. Due to Laurie Beda's public statement stating, "blast this to hirsch", I received notice about this video and the planned protest at my home 7 Saxony Drive Oakhurst, NJ 07755.

My personal address and phone number was shared to over 1000 people. Additionally, because of Laurie Beda, I received dozens of texts advising me to leave town because I was going to get a beating. I had numerous random numbers harassing me to give my wife a GET.

62. Because Laurie Beda said to “blast this to hirsch” I had received hundreds of phone calls and texts from random strangers advising me of this planned protest and that I should be prepared for a physical beating from a mob of protestors. I also received messages on Instagram which were posted publicly advising “he should expect an angry mob at his home”. These posts just certify that the people knew they were a mob.

63. Extremely important to note is that during this live video Mr. Manopla was reading the comments and telling the viewers to **NOT** go to my home at 7 Saxony Drive. He repeatedly asked the mob to not to go to my home, but Laurie Beda was insistent that “there was no movement” and “not to forget about Elizabeth”. Mr. Manopla can be seen on the live video reading the comments of Laurie Beda and repeatedly asking the crowd not to go to my home. Therefore, Laurie Beda is responsible for inciting the illegal protest at my home the night of March 10, 2021.

64. At approximately 930pm on March 10, 2021, there was a massive illegal protest outside my home at 7 Saxony Drive Oakhurst, NJ 07755.

65. A police report was filed with the Ocean Township Police Department. As stated in the police report #21OT04466, 10 Officers were needed to disperse the illegal protest. The officers heard the crowd chanting “give her a get” and my name and Elizabeth’s name being yelled.

66. The officers observed numerous vehicles blocking the roadway and cars blowing their horns, causing a civil disturbance, waking up the block and obstructing the flow of traffic. One of the officers got on a live video on Instagram that was livestreaming the protest and can be seen having a conversation with “the Mexican Pacino”. During the video, the officer can be seen advising the Mexican Pacino that the crowd was unruly and that it was not their concern regarding the divorce matter between myself and Elizabeth Kairey. I can supply said video to this Court during trial.

67. The officers heard the crowd chanting the names “Elliot and Elizabeth”.

68. Officers issued numerous motor vehicle summons.

69. There was a field reporter, named Michael Sabon Salomon, who was conversing with Mr. Manopla while the riot/protest was taking place.

70. Mr. Salomon informed Mr. Manopla that people were “smashing cars” and “demanding” that I give my wife a *GET* and trying to break my doors down.

71. Before the people arrived at my home I fled to the Ocean Township Police Dep. for my safety. I was at the police station for approximately 3 hours. Once the officers were able to disperse the protestors one of the responding officers came back to the precinct and spoke with me. I advised him I wanted to apply for an order of protection against my wife.

72. I got on the phone with a Judge and the Judge granted me a temporary order of protection against my wife. I explained to the Judge how the protestors were there to give me a beating and force me to give my wife a *GET*. The Judge understood the situation and actually advised me to try to end my divorce with my wife. I understood his position because there was no stopping the mob from coming to my home every single night. The police advised me not to

sleep home that night and offered me a safe house. I called several friends of mine asking them if I can sleep by them, but they were all afraid that the mob would find out where I was staying and would come to their homes. In the end, I was able to find one friend of mine who allowed me to sleep in his home that night. But before going to my friend I had a friend of mine check my property and he advised me there were several vehicles circling the block, apparently waiting to see if I would show up.

73. On March 9, 2021, a planned “rally” was to take place at the corner of Kings Highway and Ocean Ave in Brooklyn, New York to harass and pressure me to give my wife a GET. This planned protest was circulated on Instagram on dozens of individuals Instagram accounts. If you combine the number of followers from each account that posted the flyer it totals around 80,000 people. The express intent of the rally was to “pressure me” and “publicly humiliate me”. These comments were made on a post by Adina Miles, aka the “Flatbushgirl”, which is her Instagram name. Adina Miles has over 50,000 followers and is extremely powerful and a highly influential figure in the Orthodox Jewish world.

74. Said rally was set to take place at the corner of Kings Highway at Corporal Wiltshire Park and then make its way to my father’s medical office 2136 Ocean Ave Brooklyn, NY 11229 about 100 yards from there. The reason I say the rally was set to take place with the intent to move towards my father’s medical practice is because the actual flyer posted on Instagram stated, “starting at the corner etc...” and the people at the rally mentioned going to my father’s office.

75. On March 11, 2021, in Brooklyn, New York, said rally occurred and approximately 60-80 people were present protesting the fact that I was not giving my wife a GET. Numerous signs were held which stated, “Free Elizabeth” and “withholding a get is

abuse”. There was one police car present for the protest and zero police officers are seen in any of the numerous videos posted online attempting to control and disperse the illegal protest. Presumably, the NYPD being busy with BLM riots, was not able to handle these GET mob protestors like the Ocean Township Police department and the Spring Valley Police Dep were able to do so.

76. I advised the police at the 61st precinct the prior day, March 9, 2021, that an illegal protest was planned against me, and the protestors were going to go to my father’s medical office. The protest was certainly illegal as the New York City rules require permits for protests to be requested at least 2 weeks prior to protest in addition to a separate permit for loudspeakers, which were used at the protest.(these rules might have changed since March) In New Jersey, the Police dispersed the illegal protestors and deemed the protest illegal. In New York , the NYPD allowed a mob of rioters to destroy Dibo’s house and egg his home two nights in a row and they were going to allow the same thing to my parents’ home and business.

77. At the rally at Corporal Wiltshire Park, there were signs on cardboard stating “free Elizabeth.” And “withholding a get is abuse”. There is no question that I was the subject of the cardboard message. Essentially, I was accused of being an abuser and of kidnapping my wife or of the crime of false imprisonment.

78. There were two separate women, Adina Miles, and Amber Adler, who were using a loudspeaker to scream such things as “ no get , no peace” at the protest and Laurie Beda can be seen standing next to them at the protest, obviously supporting the message.

79. Adina Miles posted a thank you on her Instagram to “Elizabeth’s family(Laurie Beda and co.) and friends, who were ready to march to Elizabeth’s ex-husbands place of

residence and workplace to ask for her freedom”. Accordingly, they admitted that they were conspiring together and that they were going to come to my home if I didn’t give them what they wanted.

80. Adina Miles also stated on her page a warning to other “get refusers” that “we will publicly humiliate you”. There is clear evidence that the purpose of the protest was meant to defame and ridicule me in order to coerce me to give my wife the Jewish divorce papers, something which I am legally entitled to do or not to do. Moreover, there is irrefutable evidence that Adina Miles and the rest of these Defendants deemed me a GET refuser, a term which is used to incite hatred and humiliation towards its subject as can be seen from the numerous news articles posted all over the world wide web.

81. A rabbi from the community of my wife came to the protest to attempt to dispel the protestors and order them not to come to my father’s medical practice down the block. He pleaded with the protestors, specifically Laurie Beda, not to take the protestors to my father’s office.

82. In a video I can provide this Court, Laurie Beda then screamed in a threatening tone, with the mob next to her, “if he doesn’t give the GET today, we will be there(pointing to my father’s office) tomorrow. And then their house (my home and my father’s home) tomorrow.” I received a video of Laurie Beda stating the aforementioned threats and I received this video while in the State of New Jersey. The Ocean Township Police Department has viewed this video. Additionally, the video proves that Adina Miles, Laurie Beda, Heshy Tischler and Amber Adler are all co-conspirators since they all participated in this protest.

83. The Rabbi then stated that he would help Laurie Beda lead the protest the next day if I did not give the GET that same evening, March 11, 2021.

84. Laurie Beda was able to intimidate and threaten this Rabbi to join the protest the following day should I not give the GET. The Rabbi did his best to keep the protestors from coming down the block to my father's medical office that day and in fact the protestors did not come down the block to my dad's office because the Rabbi promised them I would give the GET that day.

85. My father has been loaning me money ever since June 2016 when I retired from teaching in order to pursue a career as an attorney.

86. My father still loans me money to this day when I am unable to afford my living expenses(which is still occurring).

87. My father is my sole source of support. He also supports my younger brothers. When I am unable to afford my daily living expenses my dad covers the expense and then adds it to the total amount of money I will owe him once I receive gainful employment. I live in my father's home, and he charges me minimal rent. He pays for all the utilities and that saves me thousands of dollars. Back during the height of the Covid pandemic 2020, I tried getting free housing through HUD of New Jersey, but they are wait listed and have no place for me to live, although I financially qualify for free housing.

88. My father's medical practice is primarily focused on senior citizens and having protests outside his office was going to severely damage his ability to service the public, especially during Covid-19 crisis where, of course, my dad is an essential worker. Once the Court sees videos of the Syrian Jewish Mob it will understand why my father would not have

been able to service his patients. Again, if the NYPD protected our property like the New York State Troopers did by Rabbi Gestetner's home in Spring Valley, New York then it would have been a different result.

89. I also use my father's office occasionally as an office space since I am unemployed and have not had full-time employment since June 2016, over 5 years ago.

90. Upon information and belief, Laurie Beda and the rest of these Defendants advised people to call my dad's office line number and bombard his office lines with phone calls with people screaming "give a get" to my dad's secretaries. My father's secretaries received calls every 20 minutes or so with unknown people stating, "give the get". It greatly disrupted my father's medical staff.

91. My father was extremely upset and perturbed by the set of circumstances he was facing and advised me that if I did not give the GET that night he would have no choice but to permanently throw me out of his home because of the planned continuous protests at his homes and medical office. My father was facing extreme pressure from the threat of the mob and that caused my relationship with my father to deteriorate overnight. My father was not able to handle this harassment. My father did not want his home egged and trashed. The cops weren't going to help and the only thing I could do to protect my father's properties, one of which is my permanent residence, was to give the GET as the Defendants demanded.

92. The reason my father was under such intense pressure was because the mob of protestors were planning on coming to his home 1861 East 22nd street Brooklyn, NY 11229 that night March 11, 2021, at approximately 830pm in order to mob and throw eggs and destroy my dad's property. When I came back to my dad's house at 1861 East 22nd, after the GET

proceeding, there was only one police car waiting outside our home expecting a mob of 500 people.

93. I also encountered a pile of garbage bags that were dumped right in front of our home, apparently as a warning sign of what was to come. I went over to the police and told them my name and that I gave my wife a GET. They thanked me very much and appreciated it. Those same cops advised my family members prior to my arrival that they would have had to allow the mob to egg our home and there was nothing they could do. I am still unsure as to why the Police in Ocean Township and Spring Valley did not allow GET protestors to egg homes, but the NYPD did.

94. The mob mentality is that they harass and terrorize all those they deem as “enablers”, people they deem to aid and abet what they call “Get refusers.” Laurie Beda specifically threatened to bring the mob to my parents’ home, my home and my dad’s office unless I gave my wife a GET.

95. I was placed in a virtually impossible position of having to either be thrown out of my residence with no place to go and no money to afford housing or give a Get to my wife to placate the mob. As this Court can understand, I simply had no choice but to give my wife a GET.

96. The NYPD had proven to not protect its citizens from this Syrian Jewish mob of protestors. One look at what occurred to Dibo Hafif the nights of March 8, 2021, and March 9, 2021, and this Court will understand that my parents and I had no protection from this mob.

97. Additionally, upon information and belief, Laurie Beda, then advised people to leave bad reviews on my father’s name on google review. Four separate reviews were made

March 11, 2021, by people with names not listed in my father's patient list database all stating lies and leaving terrible reviews for my dad, which he advised me that attorneys advised him it will cost him thousands of dollars to remove the posts(he also told me he is not even sure that it's possible to remove the posts). By hurting my father's business, Laurie Beda made me suffer since my father is the one who supports me when I cannot afford my living expenses.

98. My father has a sterling reputation in the medical field as a Board-Certified Anesthesiologist and Board-Certified Pain Management Doctor servicing thousands of people in the Tri-State Area. He even has patients fly in from other Countries seeking his help.

99. My father told me he was going to lose thousands of dollars daily if the mob kept bombarding his phone lines and leaving bad reviews on google and protesting outside his office. He relies on his reputation and being known as aiding a GET withholder would have destroyed his business.

100. On March 10, 2021, a woman can be seen on video surveillance on my father's property located at 1861 East 22nd Brooklyn, NY 11229, dropping off papers which stated "Free Elizabeth. Give her a GET". This woman then came into the backyard of our property and dropped off leaflets. I presume Laurie Beda and Co. sent this woman to our home. It is possible that the woman was one of her daughters, but the video is not clear enough to confirm that.

101. My father told me that he had to hire private security to protect his office because the NYPD refused to protect his office from the protestors.

102. I have irrefutable evidence that Laurie Beda has been closely involved with guiding and aiding my wife Elizabeth Kairey in our divorce matter. Back in April 2018, Laurie Beda attended an arbitration session between my wife and I. Laurie Beda came as a

representative of my wife, Elizabeth Kairey. I have audio evidence of this meeting. Accordingly, there is evidence that supports the notion that Laurie Beda was “credible” and was in direct contact with my wife throughout the week of March 8, 2021, in guiding and leading the harassment campaign against me.

103. Moreover, during the summer of 2018, Laurie Beda engaged in a malicious campaign of besmirching my name throughout the Syrian Jewish Community, which Elizabeth Kairey, Laurie Beda, Norma Tawil, and Betti Missry are all members of, regarding my refusal to give Elizabeth Kairey the *GET*. Moreover, Leon Beda, the husband of Laurie Beda, personally advised me back in 2018 that his wife pressured him to donate money to the legal expenses of Elizabeth Kairey. He told me that reluctantly, he obliged to his wife’s request, but advised her he would not be continuing to fund her litigation. He told me he gave around \$1000 and told his wife he would not be giving any more money as he felt that it was equivalent to throwing money in the garbage.

104. I have evidence that a further protest was done at the home of one of the Rabbis who declared the *GET* I gave to my wife to be invalid due to coercion. This protest took place in Spring Valley, New York several weeks after the two separate protests against me that were incited and led by Laurie Beda and attended by many of the Defendants. At this Spring Valley protest, several dozen New York State troopers and local police officers were present, including police on horses, to control the crowd. The officers further cordoned off the home of the Rabbi and were standing in front of the home and people were not able to come close to throwing eggs or destroying property belonging to the Rabbi. I wish the NYPD would have done the same in New York to protect me and my family.

II. DEFENDANT NORMA TAWIL

105. Norma Tawil goes by Norma. Tawil on her Instagram account.

106. Norma Tawil has a picture of her and her husband, attorney Ralph Tawil, and one child(presumably their child), as her icon photo on her Instagram page.

107. On or about, March 11, 2021, Norma Tawil stated on a public Instagram page “Elliot I feel bad for you that you sit home all day doing nothing except troll Abe’s page. Get a life. Fake attorney. I bet you failed the bar exam more than once.”

108. On or about March 11, 2021, a comment was posted under the name Norma Tawil on the webpage campaign for my wife mentioned prior that stated, “free Elizabeth so that she can get her life back”. A reasonable person could construe Norma Tawil’s comment as accusing me of the crimes of false imprisonment and/or kidnapping.

III. DEFENDANT BETTI MISSRY

109. At the March 11, 2021, protest a man named Heshy Tischler, who will be discussed in the forthcoming section, was speaking to the protestors stating, “I know what you want you want to go there(my father’s office)” and then, Betti Missry, the daughter of Laurie Beda, stated “we want the GET in the hands right now.” This again proved these Defendants were co-conspiring against me.

110. Betti Missry took a picture with Heshy Tischler and Alex Missry, her husband, holding up a giant cardboard sign which stated, “free Elizabeth. Withholding a GET is abuse!”. Said picture was posted on Heshy Tischler’s Instagram page and is still currently up to this date.

111. Betti Missry held up this giant cardboard sign in a public forum.

112. My name was mentioned publicly at this protest by Heshy Tischler, and he posted a video on his Instagram specifically stating that the protest was to force me to give the GET.

IV. DEFENDANTS HESHY TISCHLER AND AMBER ADLER

113. Amber Adler and Heshy Tischler are two separate individuals who were running for New York City Council 48th District during the week of March 7, 2021-March 12, 2021. Both potential councils lost the election by a wide margin.

114. Amber Adler and Heshy Tischler both utilized their social media platform including but not limited to Instagram, which they have thousands of followers, to engage in a serious harassment, defamation and intimidation campaign of Jewish orthodox men who have not granted their respective wives a GET.

115. Amber Adler and Heshy Tischler both engaged, incited, and participated in illegal riots/protests in Brooklyn, New York the week of March 8, 2021. Both Amber Adler and Heshy Tischler advocated lawless behavior(by holding up a sign which read “no get no peace” in order to coerce me to give my wife a Jewish divorce.

116. On March 10, 2021, Heshy Tischler and Amber Adler both were present and participated and incited an illegal riotous protest of a man named Dibo Hafif. Said protest took place at 2136 East 5th street Brooklyn, NY 11223. I have video evidence of both of these Defendants at the riot.

117. At said riot, there were approximately 500 to 700 people blocking public streets, throwing eggs at Dibo’s home, screaming, and honking car horns. The mob, which they call themselves, also destroyed Dibo’s air conditioning units.

118. Only one police car is seen in videos of the protest and no attempt by the NYPD was made to disperse said riot.

119. At several points during the rally Heshy Tischler and Amber Adler both incited more hatred towards Dibo Hafif by acting as leaders of the riot and speaking on loudspeakers to the protestors. Chants were being screamed “Heshy, Heshy, Heshy”. Once Heshy was seen at the riots more and more people showed up.

120. Heshy Tischler specifically stated that he would state Dibo’s name on his show every single day until he gave a *GET* in an effort to publicly humiliate him. He said he would do this to every man who doesn’t give his wife a GET.

121. Amber Adler held up a large sign at said protest which read “No GET, No Peace”.

122. Heshy and Amber used this massive riot which gained tremendous social media attention as an opportunity to promote themselves for their respective campaigns running for New York City Council.

123. The following day, March 11, 2021, both Amber Adler and Heshy Tischler attended and co-led an illegal protest at the corner of Ocean Ave and Kings Highway in Brooklyn, New York that was specifically organized in order to pressure/harass/intimidate me to give my wife a GET.

124. Said protest was mainly promoted by Adina Miles, but several other highly followed Instagram accounts posted a flyer urging people to attend this protest.

125. A picture of my wife, Elizabeth Kairey, with our daughter(whose face was blotted out) was put on the flyer for this protest.

126. The purpose of the protest was to coerce me to give me my wife a GET.

127. Several Instagram posts specifically stated that the purpose of the protest was to humiliate me publicly and bring my divorce matter to the public eye so that I would be pressured into giving my wife a Jewish divorce. Indeed, I received hundreds of texts and phone calls about this protest and all my friends, and my family were worried for my safety and well-being.

128. Amber Adler and Heshy Tischler both gave speeches at this protest to the unruly crowd of illegal protesters.

129. At the time of the protest, according to NYC 311 website, all protests with over certain number of individuals, which this protest certainly was over the limit, must have a legal permit. A permit must be applied for at least 2 weeks prior to the protest. Moreover, if a loudspeaker will be used, a special sound permit must be applied for as well.

130. Said protest was only organized a couple days prior to the March 11, 2021, protest. Accordingly, it is technically impossible that the protest was legally permitted yet the NYPD did not disperse the protest and Heshy and Amber, by definition, participated in an illegal protest directed at me.

131. Only one police car was present for said protest which, according to videos had circa 60-80 people present.

132. Amber Adler and Heshy Tischler both held up a giant sign which stated, “No GET, No Peace”. Accordingly, Amber Adler and Heshy Tischler were advocating for unruly and unpeaceful behavior towards me and my family members.

133. A planned illegal riotous mob were coming to my home located in Brooklyn, NY that evening at 8:30pm if I did not give the *GET*. I received a flyer posted on some woman's Instagram page that stated the mob was directing all their efforts at Elliot M. Hirsch because Dibo Hafif was arrested and in jail.

134. Additionally, at the March 11, 2021, protest the mob members stated they were heading to my home and father's office the following day if I did not give the *GET* that night.

135. Other signs at the protest stated, "withholding a get is abuse" and "free Elizabeth".

136. At said protest Heshy Tischler stated publicly, which was videotaped, "we are at a demonstration. This guy Elliot Hirsch did not give a *GET*. And we are here demonstrating, and we are going to get that *GET*." Then Heshy said "So I just spoke to this guy Jeffrey Stern, a federal Judge, that is guaranteeing Dr. Hirsch, actually Mr. Hirsch will give the *GET*. They are asking us not to come over there to Dr. Hirsch's office, I know you want to go over there."

137. I received all of these threats that day when the protest was occurring. Moreover, these videos are still posted on internet for the public to view.

138. On March 12, 2021, Heshy Tischler posted these videos on his Instagram account with the description, "Elizabeth Kairey Hirsch got her *GET*! B"H".

139. Amber Adler also made a public speech at the protest, which she posted on her Instagram as well, advising the crowd that she will help these women who have no *GET*'s, obviously including my wife, who the protest was organized for. She accused me of committing abuse to my wife.

140. Amber Adler then stated to the crowd that she is trying to get a bill passed that would make not giving a GET a felony in New York.

141. Heshy Tischler advised the crowd that he would publicize Dibo's name on his radio show in order to humiliate him so that he would give his wife a *GET*. Both Amber Adler and Heshy Tischler were aware that by coming to my protest and speaking about me and my personal divorce matter to their thousands of followers that it would cause me much public humiliation and intense harassment.

V. DEFENDANT ADINA MILES

141. Adina Miles is a woman who has an Instagram account called "flatbushgirl".

142. Adina Miles' Instagram account has roughly 55,700 followers.

143. On or about March 9, 2021, Adina Miles posted on her Instagram account a picture of my wife with the caption "free Elizabeth". On said flyer was a call to all of Adina Miles' followers requesting their attendance at an impromptu protest starting at Corporal Wiltshire Park located in Brooklyn, New York at 10am on March 11, 2021.

144. Adina Miles helped organize an illegal protest to commence at said park with the intention to come down the block to my father's medical practice.

145. According to Ms. Miles, the express purpose of the protest was to publicly humiliate me and pressure me and my family until I gave my wife a GET and "set her free".

146. On March 11, 2021, Adina Miles was one of the people leading the protest at Corporal Wiltshire Park.

147. According to the 311 websites of NYC, protests need valid permits and if using loudspeakers, sound permits are additionally required. Adina Miles is seen in videos using a loudspeaker at said protest in addition to Amber Adler as well who used a loud speakerphone.

148. At said protest, Ms. Miles, specifically stated that if I do not give my wife the GET that day she would come back the following day to continue protesting. She further confirmed this by a post on her Instagram account the same day.

149. Ms. Miles was part of a group of women that specifically stated they would bring the protestors to my father's medical office and then our home(presumably both of my father's homes as the previous night there was an illegal riot at my Oakhurst residence and there was a police car outside my father's Brooklyn home the night of March 11, 2021) the following day should I not give my wife the *GET* that day March 11, 2021.

150. On or about March 11, 2021, Adina Miles posted on her Instagram account videos of the protest, and she acknowledged all of the above-mentioned threats that were made to me.

151. I received all of these videos and posts via the electronic means while in the State of New Jersey.

152. The next day, March 12, 2021, Adina Miles, posted a flyer which stated, "Elizabeth is free". She captioned the flyer with a warning on her Instagram account advising all "get refusers" that you will be next. It is obvious that she was referring to me as the first GET refuser she went after.

153. She then stated, "we will publicly humiliate me, we will have you fired from your job, we will find ways to have you arrested" and "we will not rest until every prisoner is set free".

VI. DEFENDANT YESHIVA OF FLATBUSH JOEL BRAVERMAN HIGH SCHOOL

154. At said illegal protest, around 10 or so high school girls were sent by the Yeshiva of Flatbush High School, a private school that purports to follow Orthodox Judaism but in fact, does not follow Orthodox Judaism because according to Orthodox Judaism one can only pressure a man to give a *GET* when it is authorized by a Rabbinic Court. Said students held a flyer stating, “let her go.”

155. Yeshiva of Flatbush sent 10 of its students on a regular school day and gave them volunteer hours to go attend a protest that was specifically arranged in order to coerce me to give my wife a GET.

VII. DEFENDANT ELISHEVA YARIMI

156. Elisheva Yarimi is a woman who has around 11,000 Instagram followers and her Instagram name is called iitsanellie.

157. Elisheva was one of the leaders of the mob at Dibo Hafif’s riots.

158. Elisheva posted on her Instagram account that Dibo was put in jail. A fact which is verified by a video which shows Dibo being arrested by the NYPD.

159. According to news media sites, a member of the Syrian community convinced Dibo’s current wife to get Dibo arrested.

160. On March 11, 2021, Elisheva posted a flyer on her Instagram account that stated the mob should focus on their efforts on me(see attached Exhibit).

161. She stated that a protest was planned at my home for that night March 11, 2021.

162. Said protest did not occur because I gave the GET that same night March 11, 2021, right before the mob was headed to my parents' home.

**FIRST CAUSE OF ACTION-INTENTIONAL INFLECTION OF EMOTIONAL
DISTRESS**

163. Plaintiff repeats, reiterates, and incorporates the allegations contained in paragraphs numbered "1" through "162" herein with the same force and effect as if the same were set forth at length herein.

164. On a claim for intentional infliction of emotional distress, the plaintiff must prove that defendant acted intentionally or recklessly; the defendant must have either intended to do the act with the intent to produce the emotional distress or acted recklessly in deliberate disregard of a high degree of probability that emotional distress would follow.

165. In order to establish a claim for intentional infliction of emotional distress, the plaintiff must prove that defendant's conduct was extreme and outrageous, and the conduct must be so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized community.

166. Plaintiff seeking to recover for intentional infliction of emotional distress must prove that defendant's conduct was a proximate cause of plaintiff's emotional distress.

167. On a claim for intentional infliction of emotional distress, the emotional distress suffered by plaintiff must be so severe that no reasonable person could be expected to endure it.

168. On a claim for intentional infliction of emotional distress, when the conduct is directed at the plaintiff, she need not prove physical injury; it is sufficient that the conduct produced emotional distress that is severe.

169. All the Defendants engaged in conduct deliberately and expressly directed at me.

170. All the Defendants expressly intended to cause me severe emotional distress in order so that I give the GET to my wife. In fact, Abe Manopla, stated in one of his videos, “elliot won’t be able to handle the crowd. He is going to give the get”.

171. The Defendants participated in a gigantic protest specifically aimed at coercing me to give my wife a GET. The Defendants brought my private divorce controversy to the public eye and caused me intense humiliation and harassment. It even caused my family serious problems as my mother was being threatened from being fired as teacher in her job at Magen David Yeshiva, a Syrian Jewish School(my mother is of Mexican/Syrian descent, but my father is Ashkenaz as his parents are from Europe one of them escaping Nazi Germany in 1940 as an 8-year-old boy.) It is noted that the Syrian community uses a derogatory term for Ashkenaz Jews² such as myself and I was referred to by a member of this mob with a Jewish slur.

172. Even the people involved with the mob knew that it would be impossible for me to withstand such intense emotional distress and that I would have no choice but to give the GET. In one of the videos, Laurie Beda states to the Rabbi that she knows only because of this pressure was there a chance that I was going to give the GET.

² See <https://www.nytimes.com/2007/10/14/magazine/14syrians-t.html>

173. The conduct engaged in by all the Defendants was outrageous and extreme and is utterly intolerable in a civilized society.

174. The Defendants engaged in a deliberate intense campaign of oppression, humiliation, and intimidation so that I give my wife a GET.

175. The express purpose of their actions was to violate my freedom of religion and force me to do something which is constitutionally protected under my first amendment right of freedom of religion.

176. There can be no tolerance in a civilized society for individuals to engage in coercive, harassing, and threatening actions in order to force people to do things regarding their religious beliefs. These actions must be punished with strong force so that the people in society understand that they cannot coerce individuals to do things that are protected under the first amendment of the United States Constitution.

177. Because of the actions of the Defendants I am now in need of continuous therapy and trauma treatment. All the Defendants intentionally brought my divorce controversy to the public attention and stated lies about me that I was withholding a GET and I was committing abuse. This caused me intense emotional suffering. One member of the mob even posted a video of himself talking to one of their leaders, publicly stating he was withdrawing from the crazed mob as he realized “who gave us the right to harass Dr. Hirsch”? Therefore, they themselves knew they were causing intense emotional distress.

178. By publicly calling me an abuser and a GET refuser the Defendants caused me much humiliation. Moreover, most of these derogatory comments are permanently available on the internet and will likely be impossible to take down.

179. My reputation is permanently damaged, and I will now suffer severe emotional distress because of the Defendants. Two citizens running for city council and using their political power to engage in a malicious campaign of harassment to coerce me against my first amendment freedom of religion fittingly fits the category for a claim of intentional infliction of emotional distress. But for the actions of Heshy Tischler and Amber Adler and the rest of these Defendants, I would not have suffered such intense and public humiliation.

180. On May 12, 2021, I received a letter from Ashley Egleston, a licensed counselor at Ocean Township Human Services. The letter states “ Dear Mr. Hirsch, on May 5, 2021, you had participated in a consultation at this agency. Information presented during this consultation indicates the need for further assessment by way of a psychological evaluation. It is also recommended that you present for a psychiatric evaluation to determine if you are a candidate for medication. This recommendation is not in the agency’s scope of practice. As such, it is recommended that you present to an agency providing both of these services to best serve you. Below you will find agencies that historically provided both services. “

181. I contacted both of the service providers that Ms. Egleston recommended to me. Only one of them got back to me, namely, CPC behavioral healthcare. After speaking to CPC, they recommended me to Penn Medical Princeton Health.

182. I have spoken to the intake unit at Penn Medicine Princeton Health, and they have determined that I qualify for the men’s trauma therapy program. However, said program is fully booked and they have placed me on a waiting list.

183. I am in deep need of therapy due to the actions of the Defendants that took place the week of March 8, 2021, and the permanent posts now spread out on the internet. I have

commenced therapy with Dr. Richard Kessler a licensed psychologist. I have great trouble sleeping, eating, socializing, exercising, doing daily chores around the home. I also have depression, nightmares and difficulty being engaged and functioning as a regular person in society. I have severe anxiety, trauma, nightmares, and fear. I suffer from these conditions only because of the actions of the Defendants and prior to March 8, 2021, I did not suffer from any of these conditions. However, none of my current symptoms affect my relationship with my daughter and I am fully able to parent and have custody of my child.

184. My temporary license that authorizes me to practice law, which was signed by Presiding Justice Alan D. Scheinkman of the Supreme Court of New York Appellate Division 2nd Dep. is set to expire this August 2021.

185. Although I have not made any money in my position as a temporarily lawyer I was able to advertise and promote myself to provide legal services and my name spread around and I did receive several phone calls with people seeking counsel. Although I did not end up representing anyone, I did plan on taking the bar this July 2021 and then start practicing as a regular attorney. I believe that I was going to be able to start representing people after I passed the bar in July. But my reputation in the legal field has been irretrievably damaged as the general public considers me an “abuser” and this is only because of the actions of each and every one of the Defendants.

186. It is submitted that I have been diagnosed with severe ADHD since about the age of 8 years old.

187. Additionally, I was recertified with ADHD not so long ago and I received extra time on both my LSAT and all law school examinations. I also received a private room for all examinations due to extreme difficulty in my ability to focus.

188. Laurie Beda, Norma Tawil and Betti Missry, all related to my wife, are aware of my ADHD and should be held accountable for knowingly causing me stress that they knew would be exacerbated by my mental condition. Additionally, the Yeshiva of Flatbush is aware of my medical history being that I was a student there from 5th grade through 12th grade.

189. Because of the actions of the Defendants during March 2021, which was the time I was planning on dedicating to signing up for the Bar Examination and concluding my studies, I was effectively precluded from doing so by suffering the intense emotional distress I was subjected to by these Defendants. Some of these Defendants are high powered public figures in positions of authority; namely, Heshy Tischler and Amber Adler and the Yeshiva of Flatbush. Because they each participated the public was under the impression that the protests were for good cause. Under New York Law, said positions cause the threshold needed to be met for claims of intentional infliction of emotional distress to be reduced. I would presume the same concept applies in New Jersey law for claims of IIED.

190. I will now have a loss of future income as an attorney because of the Defendants actions in destroying my reputation and for causing my such emotional distress that I am unable to study properly for the Bar exam. Additionally, because the Defendants brought my divorce controversy to the public attention and because Laurie Beda published the contents of the webpage, my wife gathered approx. \$128,000 in order to continue her lawsuit against me, which includes her attempt to eradicate me from our daughter's life. I am now going to be in Court much longer because my wife just got more money to continue her lawsuit against me. Her three

Defendant cousins are all aware of what my wife in Court is trying to do and they are guilty of causing me more emotional distress dealing with a highly contested divorce matter. Attached hereto as Exhibit is evidence that the Rabbis have confirmed that in the past my wife denied me visitation without reason. I have been suffering what is called parental alienation at the hands of Elizabeth Kairey. By the Defendants bringing my divorce controversy to public light and by damaging my name publicly they have created the circumstances necessary that my wife needed to gather up such a large sum of money to continue her lawsuit against me.

191. To give just one example of the emotional distress I am still subjected to, after not having attended Temple services in over 4 months because of my anxiety and trauma, about two weeks ago, I was invited over by a long-time friend to his home for a Sabbath meal and prayers afterwards. When I arrived at the home there was approximately 25 men sitting at the dining room table. At one end of the table was a man named Isaac Cohen who is a member of the Shomrim Patrolmen, a Brooklyn neighborhood watch group that is a quasi-type of police enforcement. Shomrim works closely with the NYPD. Mr. Isaac Cohen, who has publicly commented on numerous Instagram videos that I should “pay child support”, immediately began hurling threats at me. He stated that if I came near him I would not be able to walk out of the home that night. He further started screaming that I am an asshole and piece of shit. He repeatedly berated me that I should “pay child support” and that I am not a man. After about 25 minutes of non-stop the verbal harassment, one of the other men in the home advised Mr. Cohen that he must shut his mouth. At that point, the meal was over, and prayers began. I came home dejected and emotionally scarred.

192. On another occasion, I took my daughter to the pizza store in Brooklyn, NY about 1 month ago and in the pizza shop I was being stared at by a random woman. I asked her if I

could be of assistance, and she said she recognized me from all the Instagram posts and asked me how I was able to walk around in the neighborhood after what happened to me. She said if I were you I would not be able to walk outside in public. Again, I felt dejected and emotionally scarred. There is zero tolerance for a person, especially a public figure, to galvanize thousands of people to engage in illegal protests to coerce someone to do something he or she is legally entitled to do or not to do. Said actions must be punished with severity, especially when targeting a specific individual. Currently in our country we have many riots and protests against systemic racism and other general wrongs. There is no countenance for people to specifically target certain individuals and publicly encourage the masses to riot and harass said individuals to engage or refrain in permissible conduct. Such behavior is intolerable in a civilized society and must be punished with extreme measures in order to prevent them from happening again.

SECOND CAUSE OF ACTION-DEFAMATION

193. Plaintiff repeats, reiterates, and incorporates the allegations contained in paragraphs numbered “1” through “192” herein with the same force and effect as if the same were set forth at length herein.

194. To establish a prima facie case of defamation, a plaintiff must establish the defendant (1) made a defamatory statement (2) concerning the plaintiff, (3) which was false, (4) was publicized to a third party, and (5) caused damages to plaintiff.

195. A defamatory statement is one that is (1) false and injures another person's reputation, or (2) subjects a person to hatred, contempt, or ridicule, or (3) causes others to lose good will or confidence in that person.

196. All the Defendants deliberately intended to subject me to hatred , contempt, and ridicule. They all also wished to cause others lose confidence in me and to take away any good will I have with others.

197. The specific express purpose of all of the Defendants actions were, and I quote Adina Miles “we will publicly humiliate you; we will find ways to have you arrested, we will have you fired from your job.”

198. The Defendants all were deeply involved in a campaign to bring my divorce controversy to the public eye and with the express intention to cause me intense ridicule and public humiliation. Indeed, I received several messages advising me to leave town as my name is permanently damaged in the community because of the actions of the Defendants.

199. All the Defendants are guilty of accusing me of withholding a GET and calling that abuse.

200. According to Orthodox Jewish Law I was not withholding a GET. In fact, according to one of the exhibits I have submitted, the GET was to be given until all my divorce issues between Elizabeth and I were concluded. As of yet, I am not legally divorced. Accordingly, I am still unobligated and in fact, not supposed to give my wife a GET until my divorce is settled.

201. According to Rabbi Gestetner, one of the several Rabbis who has declared my GET to be invalid, any GET given while a divorce action is commenced by the wife against the husband in secular court is considered null and void.

202. I have never been convicted of a crime of abuse to my wife.

203. Laurie Beda is specifically responsible for publishing the contents of the webpage campaign on her Instagram page in which she helped my wife gather circa \$128,000 in order to continue her lawsuit against me, which is causing me additional distress by being involved in a divorce action that requires much mental attention.

204. The contents of the webpage were extremely defamatory and false.

205. All the comments posted on said page were, in context, meant to cause me public humiliation.

206. I did in fact pay my wife child support and I was never in violation of a Court order to pay child support. I also didn't appeal every decision of the Supreme Court and said statement accusing me of doing so was meant to cause the public to view me as a vexatious litigant, which is a term that will cause me to lose good will in the public eye and further hurt my reputation.

207. By bringing my personal divorce case to the public eye, all the Defendants intentionally caused the public to lose good will in me.

208. A defamatory statement is one that tends to harm the reputation of the plaintiff or to lower plaintiff in the estimation of the community or deter third persons from associating or dealing with him or her.

209. All over the internet the posts about "GET refusers" state that the public should stop associating and dealing with said refusers. The Defendants knew that by stating I was withholding a GET they would be causing people to stop associating with me.

210. Hundreds of posts and comments were made about me on Instagram because of the protests that occurred outside my home and my father's office.

211. It is important to note that not one Rabbinic Court permitted the Defendants to do any of the actions they did.

212. I am completely embarrassed and humiliated to go into any social events or Synagogues in the community where I live.

213. Everywhere I go I am recognized as a GET withholder.

214. A plethora amount of news media sites reported on the protests. Heshy Tischler, Amber Adler and Adina Miles gained nationwide attention for their involvement in protesting me and others.

215. The Guardian and Vogue, both widely popular national news magazines, both published news articles on their sites reporting on my protest and others as well and this so called Agunah movement. What these media sites aren't aware of is that the people in charge of these campaigns are engaging in criminal acts of harassment and intimidation in order to violate the men's freedom of religion.

216. Several Jewish news media sites published the stories of the protests and in fact on one website there is a picture of me and my wife with a title that claims my wife was an Agunah. My wife is not an Agunah and said term causes me much humiliation and causes me to lose good will in the eyes of the public.

217. Said website causes me permanent reputation damage as an Agunah is a term used by the media for a woman who did not receive a GET from her husband. Said term draws

the ire of the public towards the husband and causes damage to the reputation of the husband and his family.

218. In fact, the term Agunah truly does not refer to the case where a man simply refuses to give his wife a GET.

219. According to Orthodox Judaism, an Agunah, is a case where a man is unable to be located and his wife therefore remains without a GET. An agunah is not in a case when a man does not give his wife a GET and no Beth Din has obligated him under pressure methods to do so.

220. The undersigned is quite confused why the FBI and US Department of Justice did not pursue the claim made by me that the Defendants violated 18 U.S. Code § 241 - Conspiracy against rights. If this Court has the power to direct the US Department of Justice to prosecute I would ask that it do so if the Court believes the Defendants violated said US code.

221. Normal Tawil accused me of being a Fake attorney. Said statement of fact was false and caused me much public humiliation and loss of good will as many people now think I am not allowed to function as an attorney, when in fact, at the time of said statement I was authorized to practice law.

222. Laurie Beda is guilty of helping my wife raise \$128,000 to sue me. Laurie Beda did so by defaming me in a public setting. Accordingly, I am suffering damages of additional legal fees and time spent in divorce court because of Laurie Beda, which is taking away valuable time I need in order to study for the Bar exam and get a job.

223. All the Defendants accused me of abuse and not “Freeing” my wife Elizabeth. The Defendants accused me of the crimes of false imprisonment and kidnapping. Non-Jews are

not familiar with the GET laws and Orthodox Judaism and the hashtag on Instagram #freelizabETH brings up my wife's picture and all of these posts about my divorce case. Most people will not understand that they are referring to a Jewish divorce matter. A reasonable person will assume I am being accused of said crimes.

224. I have never been convicted of any crime, let alone any crimes against my wife.

225. I also have never been arrested for, allegedly, committing any crimes.

THIRD CAUSE OF ACTION- 42 U.S. CODE § 1985

226. Plaintiff repeats, reiterates, and incorporates the allegations contained in paragraphs numbered "1" through "225" herein with the same force and effect as if the same were set forth at length herein.

227. The Defendants engaged in acts in furtherance of a conspiracy for the purpose of depriving me, either directly or indirectly, equal privileges and immunities under the laws of the United States.

228. I was deprived of my rights under the United States Constitution of Freedom of Religion.

229. I was specifically targeted to give my wife a GET, a Jewish divorce document.

230. Under no circumstance can the Defendants be allowed to harass me and bring a mob of rioters to my home, destroy my property, and not allow me to live in peace in my private residence. The Defendants incited illegal riots at my home and threatened to do so daily.

231. The Defendants conspired together at the protest on March 11, 2021, by Corporal Wiltshire Park.

232. The Defendants certainly violated the local noise ordinances in New Jersey and forced me to flee my home out of fear of being mobbed. I was also scared to sleep home for the next 3 weeks due to the trauma I suffered because of these Defendants.

232. The Defendants all classified me as a “get refuser” and a “get denier”. Said classification is religiously based and the Defendants have an invidiously discriminatory animus towards what they deem are GET refuser. In reality, I am not a GET refuser. But they deemed me one.

233. The Defendants single out orthodox Jewish men who have not given their wife a GET and then based upon their own determinations decide who to harass and threaten to give his wife a GET.

234. Unfortunately, the Defendants singled me out and targeted me until I gave my wife a GET and I was completely coerced to do so.

235. Under no circumstance would I have given my wife a GET if not for the actions of the Defendants.

236. I am not legally divorced and according to State law if either my wife or I participated in a religious marriage while being legally married it would be in violation of State law and a crime.

237. Additionally, according to my religious beliefs, I was not obligated to give my wife a GET and I am still not obligated to give her a GET.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Pro Se Elliot M. Hirsch requests that the Court enter an Order, adjudge, and decree in favor of Plaintiff for:

A. An award of Compensatory and Punitive damages to the Plaintiff in an amount to be determined at trial but not less than \$15,000,000 with the Court adjudicating the amount to be attributed to each Defendant.

B. An injunction enjoining the Defendants from speaking about the Plaintiff in any public forum including but not limited to all forms of social media.

C. A permanent civil restraining order preventing the Defendants from contacting me in any form whatsoever;

D. An award of treble as well as punitive damages due to Defendants' actions as willful, wanton, and malicious in any amount to be determined at trial;

E. An award of such other and further relief as the Court may deem just and proper.

VIII. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11. I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to

keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

Dated: July 12, 2021

A handwritten signature in black ink, appearing to read 'E. Hirsch', is written over a horizontal line.

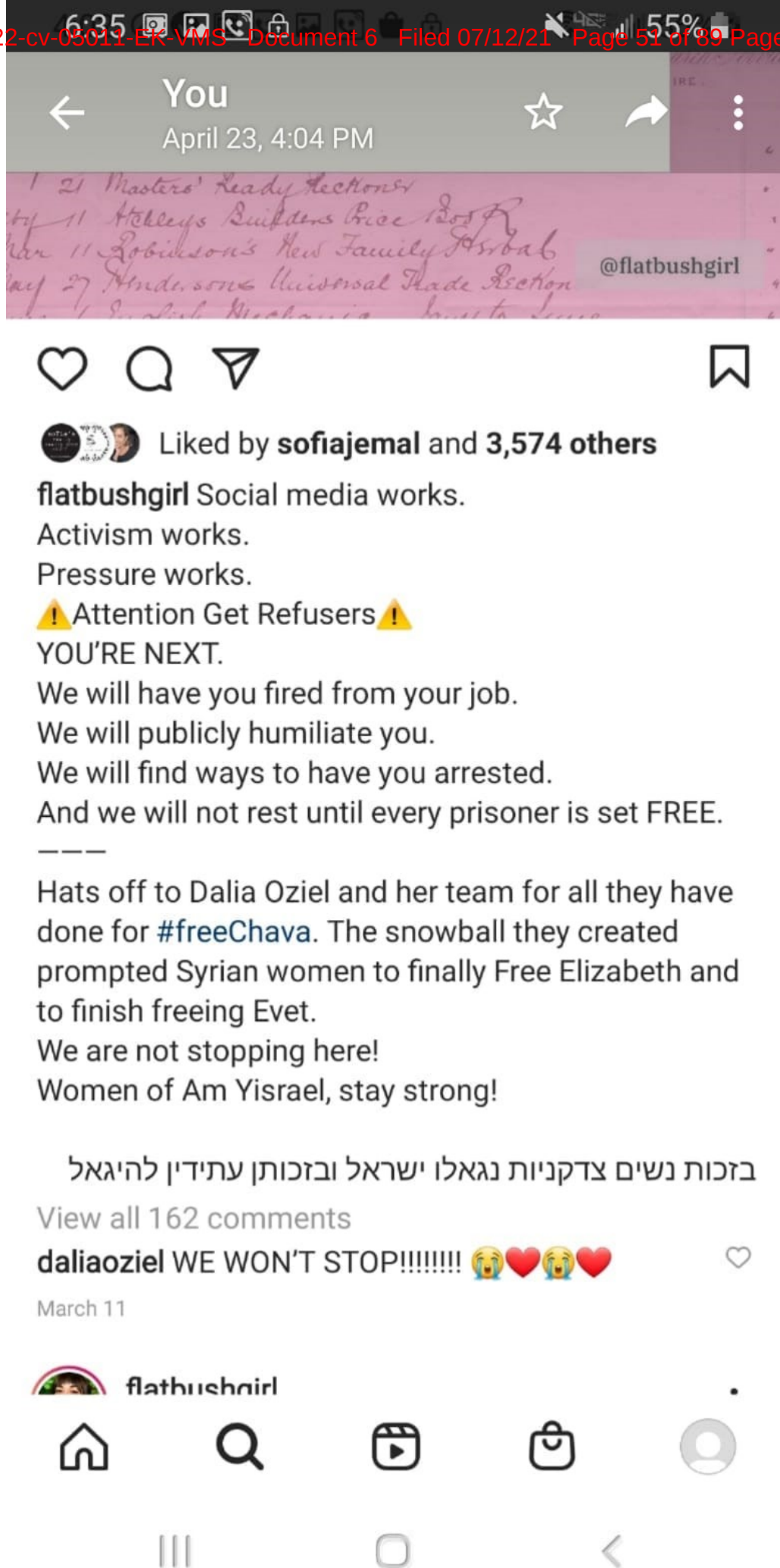
Elliot M. Hirsch

917 750 0418

Address: 7 Saxony Drive, Oakhurst, NJ 07755,

County of Monmouth

EXHIBIT A



COMPLAINT - SUMMONS

COMPLAINT NUMBER				THE STATE OF NEW JERSEY VS. LAURIE BEDA 1047 STRATTON PLACE LONG BRANCH NJ 07744-0000	
1337	S	2021	000195		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005 COUNTY OF: MONMOUTH					
# of CHARGES 3	CO-DEFTS	POLICE CASE #:		DEFENDANT INFORMATION SEX: EYE COLOR: DOB: DRIVER'S LIC. #: SOCIAL SECURITY #: SBI #: TELEPHONE #: 718-314-7963 (C) LIVSCAN PCN #:	
COMPLAINANT NAME: ELLIOT HIRSCH 7 SAXONY DRIVE OAKHURST NJ 07755				DL STATE:	

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about **03/10/2021** in **OCEAN TWP**, **MONMOUTH** County, NJ did: **WITHIN THE JURISDICTION OF THIS COURT, WITHIN THE JURISDICTION OF THIS COURT, LAURIE BEDA ADVISED A MOB OF 700 TO LET ME KNOW I WILL BE GETTING A "BEATING" AT MY HOME 7 SAXONY DRIVE GIVE MY WIFE A "GET". SHE ALSO STATED PUBLICALLY ON VIDEO THAT "IF I DO NOT GIVE A "GET" TODAY MARCH 11, 2021, THE PROTESTORS WILL BE AT MY HOME TOMORROW. THE MOB PROTESTORS ARE CONFIRMED TO HAVE DAMAGED THE NIGHT BEFORE THE PROPERTY OF ANOTHER INDIVIDUAL THE NIGHT BEFORE BY THROWING EGGS AT THE HOME. I HAVE EVIDENCE OF ALL THIS. LAURIE BEDA THREATEN MY PROPERTY AND ME THAT IF I DONT GIVE HER NIECE THE "GET." ON MARCH 10, 10 OCEAN TOWNSHIP POLICE OFFICERS WERE NEEDED TO DISPERSE THE ILLEGAL PROTEST IN VIOLATION OF STATUTE N.J.S.A 2C:33-4A.**

WITHIN THE JURISDICTION OF THIS COURT, LAURIE BEDA ADVISED A MOB OF 700 PEOPLE TO LET ME KNOW I WILL BE GETTING A "BEATING" AT MY HOME 7 SAXONY DRIVE UNLESS I GIVE MY WIFE A "GET". SHE ALSO STATED PUBLICALLY ON VIDEO THAT "IF I DONT GIVE A

in violation of:

Original Charge	1) 2C:33-4C	2) 2C:33-4A	3) 2C:33-2A(1)
Amended Charge			

CERTIFICATION I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: X

Date: X 5/11/21

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS

☐ Probable cause **IS NOT** found for the issuance of this complaint:

Signature of Court Administrator or Deputy Court Administrator

Date

Signature of Judge

Date

☒ Probable cause **IS** found for the issuance of this complaint-summons:

Signature of Judge

Date

SUMMONS

YOU ARE HEREBY **SUMMONED** to appear before the Municipal Court in the county of: **MONMOUTH**

at the following address: **OCEAN TOWNSHIP MUNICIPAL COURT**

399 MONMOUTH RD

OAKHURST

NJ 07755-0000

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

Date of Arrest:

Appearance Date: **06/22/2021**

Time: **10:15AM**

Phone: **732-531-5005**

Signature of Person Issuing Summons:

TIMOTHY MCGOUGHAN JUDICIAL OFFICER

Date: **05/11/2021**

☐ **Domestic Violence – Confidential**

☐ **Related Traffic Tickets or Other Complaints**

☐ **Serious Personal Injury/ Death Involved**

Special conditions of release:

- ☐ **No phone, mail or other personal contact w/victim**
☐ **No possession firearms/weapons**
☐ **Other (specify):**

ORIGINAL

COMPLAINT - SUMMONS

COMPLAINT NUMBER				STATE V.	LAURIE BEDA
1337	S	2021	000195		
<small>COURT CODE</small>	<small>PREFIX</small>	<small>YEAR</small>	<small>SEQUENCE NO.</small>		

"GET" TODAY MARCH 11, 2021, THE PROTESTORS WILL BE AT MY HOME TOMORROW. THE MOB PROTESTORS ARE CONFIMED TO HAVE DAMAGED THE NIGHT BEFORE THE PROPERTY OF ANOTHER INDIVIDUAL THE NIGHT BEFORE BY THROWING EGGS AT THE HOME. I HAVE EVIDENCE FOR ALL THIS. LAURIE BEDA THREATEN MY PROPERTY AND ME THAT IF I DONT GIVE HER NEICE THE "GET." ON MARCH 10, 10 OCEAN TOWNSHIP POLICE OFFICERS WERE NEEDED TO DISPERSE THE ILLEGAL PROTEST IN VIOLATION OF STATUTE N.J.S.A 2C:33-4A.

WITHIN THE JURISDICTION OF THIS COURT, LAURIE BEDA PUBLICALLY ON INSTRAGRAM WITH 700 VIEWERS CREATED DANGEROUS CONDITION AND PURPOSE TO CAUSE PUBLIC ANNOYANCE AND INCONVENIENCE BY ADVISING 700 PLUS PEOPLE TO COME TO MY HOME TO RIOT AND PROTEST. SHE ALSO STATED IN A PUBLIC PLACE VERBALLY SHE WILL BRING A MOB OF ILLEGAL PROTESTORS WHO HONK AND BLOCK STREETS TO PUBLIC WALKWAYS TO MY HOME AT 7 SAXONY DRIVE. I HAVE VIDEO EVIDENCE FOR EVERY SINGLE ALLEGATION MADE. 10 OCEAN TOWNSHIP POLICE OFFICERS RESPOND ON MARCH 10, 2021 TO MY RESIDENCE AND DISPERSE THE ILLEGAL PROTEST AT MY RESIDENCE. OFFICERS HEARD MY NAME BEING YELLED AND PEOPLE DEMANDING THE "GET." OFFICERS CONFIRMED THAT THE PROTESTORS BLOCKED THE STREET AND WERE CAUSING A DISTURBANCE IN VIOLATION OF STATUTE N.J.S.A 2C:33-2A(1).

Original Charge			
Amended Charge			

COMPLAINT - SUMMONS	
Page 2 of 11	NJ/CDR1 1/1/2017

COMPLAINT - SUMMONS

COMPLAINT NUMBER				THE STATE OF NEW JERSEY VS. LAURIE BEDA	
1337	S	2021	000203		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	ADDRESS: 1047 STRATTON PLACE LONG BRANCH NJ 07744-0000	
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005					
# of CHARGES 1		CO-DEFTS	POLICE CASE #:	DEFENDANT INFORMATION	
COMPLAINANT NAME: ELLIOT HIRSCH 7 SAXONY DRIVE OAKHURST NJ 07755				SEX: EYE COLOR: DOB: DL STATE:	
				DRIVER'S LIC. #:	
				SOCIAL SECURITY #:	SBI #:
				TELEPHONE #: 718-314-7963 (c)	
				LIVSCAN PCN #:	

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/10/2021 in OCEAN TWP, MONMOUTH County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, LAURIE BEDA INCITED AND URGED 700 PLUS PEOPLE TO COME TO MY HOME 7 SAXONY DR, OAKHURST, NJ, 07755 TO FORCE ME TO GIVE MY WIFE A "GET" THE JEWISH DIVORCE PAPERS. SHE SPECIFICALLY STATED TO BLAST THE MESSAGE DIRECTLY TO ME THAT I WOULD RECIEVE A MOB OF PROTESTORS TO GIVE ME A BEATING FOR THE "GET." THEN ON MARCH 10, 2021 THE MOB CAME TO MY HOME AND I STAYED IN THE POLICE STATION FO RMY PROTECTION. THE NEXT DAY LAURIE BEDA SAID IN A PUBLIC PARK THAT "IF HE (ME) DOESNT GIVE THE "GET" TODAY, WE (THE MOB) WILL BE AT HIS FATHERS WORK PLACE TOMORROW AND THEN MY HOME." THEREFORE, IN ORDER TO STAVE OFF THE MOB FROM COMING TO MY HOME AGAIN AND IN ORDER TO NOT RECIEVE THREATS OF BEATING AND VIOLENCE, WHICH I RECIEVED MANY, I GAVE THE "GET" ON MARCH 11, 2021 AT 8:20 PM. THE MOB IS CONFIRMED TO THROW EGGS AT HOMES AND BLOCK TRAFFIC, HONK HORNS AND CAUSE CIVIL DISTURBANCE IN VIOLATION OF N.J.S.A. 2C:13-5A(7). POLICE CASE NUMBER 21OT08268

in violation of:

Original Charge	1) 2C:13-5A(7)	2)	3)
Amended Charge			

CERTIFICATION I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: X

Date: X 6/7/21

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS

☐ Probable cause IS NOT found for the issuance of this complaint:

Signature of Court Administrator or Deputy Court Administrator

Date

Signature of Judge

Date

☒ Probable cause IS found for the issuance of this complaint-summons:

Signature of Judge

Date

SUMMONS

YOU ARE HEREBY SUMMONED to appear before the Superior Court in the county of: MONMOUTH

at the following address: MONMOUTH COUNTY COURTS

71 MONUMENT PARK

PO BOX 1271

FREEHOLD

NJ 07728-0000

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

Date of Arrest:

Appearance Date: 07/20/2021

Time: 09:30AM

Phone: 732-358-8700

Signature of Person Issuing Summons: TIMOTHY MCGOUGHAN JUDICIAL OFFICER

Date: 06/07/2021

☐ Domestic Violence - Confidential

☐ Related Traffic Tickets
or Other Complaints

☐ Serious Personal Injury/ Death
Involved

Special conditions of release:

- ☐ No phone, mail or other personal contact w/victim
☐ No possession firearms/weapons
☐ Other (specify):

ORIGINAL

Page 1 of 11

NJ/CDR1 1/1/2017

COMPLAINT - SUMMONS

COMPLAINT NUMBER			
1337	S	2021	000315
COURT CODE	PREFIX	YEAR	SEQUENCE NO.
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005 COUNTY OF: MONMOUTH			
# of CHARGES 2	CO-DEFTS	POLICE CASE #:	
COMPLAINANT NAME: ELLIOT HIRSCH 7 SAXONY DRIVE OAKHURST NJ 07755		THE STATE OF NEW JERSEY VS. LAURIE BEDA ADDRESS: 1047 STRATON PLACE LONG BRANCH NJ 07744-0000 DEFENDANT INFORMATION SEX: EYE COLOR: DOB: DRIVER'S LIC. #: DL STATE: SOCIAL SECURITY #: SBI #: TELEPHONE #: 718-314-7963 (C) LIVESCAN PCN #:	

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/10/2021 in OCEAN TWP, MONMOUTH County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, LAURIE BEDA PARTICIPATED IN A ILLEGAL MOB OF PROTESTORS AND THEN STATED PUBLICLY SHE WOULD COME TO MY HOME TO CAUSE A CIVIL DISTURBANCE, BLOW HORNS AND THROW EGGS IF I DID NOT GIVE MY WIFE A "GET." I HAVE VIDEO EVIDENCE OF THE MOB THROWING EGGS AND CAUSING CIVIL DISTURBANCE IN VIOLATION OF N.J.S.A. 2C:33-2A(1)

WITHIN THE JURISDICTION OF THIS COURT, LAURIE BEDA THREATENED TO COME TO MY HOME AND THREATENED TO BRING A MOB OF VIOLENT PROTESTORS TO MY HOUSE, WHICH CAUSED ME TO FLEE MY HOME AND HIDE IN THE OCEAN TOWNSHIP POLICE STATION THE NIGHT OF 03/10/2021. SHE BROUGHT A MOB OF PEOPLE TO MY HOME WHICH THE POLICE DEPARTMENT CONFIRMING THAT IT CAUSED A CIVIL DISTURBANCE. SHE ALSO THREATENED TO DO IT AGAIN ON 03/11/2021 IF I DID NOT GIVE MY WIFE A "GET" IN VIOLATION OF N.J.S.A. 2C:33-4A

in violation of:

Original Charge	1) 2C:33-2A(1) 2C:5-1C	2) 2C:33-4A	3)
Amended Charge			

CERTIFICATION I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: 

Date: 6/22/21

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS

☐ Probable cause IS NOT found for the issuance of this complaint:

Signature of Court Administrator or Deputy Court Administrator

Date

Signature of Judge

Date

☒ Probable cause IS found for the issuance of this complaint-summons:

Signature of Judge

Date

SUMMONS

YOU ARE HEREBY SUMMONED to appear before the Municipal Court in the county of: MONMOUTH

at the following address: OCEAN TOWNSHIP MUNICIPAL COURT

399 MONMOUTH RD

OAKHURST

NJ 07755-0000

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

Date of Arrest:

Appearance Date: 07/13/2021

Time: 10:15AM

Phone: 732-531-5005

Signature of Person Issuing Summons: KAITLYN BELLARDINO JUDICIAL OFFICER

Date: 06/22/2021

☐ Domestic Violence - Confidential

☐ Related Traffic Tickets
or Other Complaints

☐ Serious Personal Injury/ Death
Involved

Special conditions of release:

- ☐ No phone, mail or other personal contact w/victim
☐ No possession firearms/weapons
☐ Other (specify):

ORIGINAL

Page 1 of 11

NJ/CDR1 1/1/2017

COMPLAINT - SUMMONS

COMPLAINT NUMBER				THE STATE OF NEW JERSEY VS. ADINA MILES	
1337	S	2021	000289		
<small>COURT CODE</small>	<small>PREFIX</small>	<small>YEAR</small>	<small>SEQUENCE NO.</small>		
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005 COUNTY OF: MONMOUTH				ADDRESS: 1416 E 16TH STREET BROOKLYN NY 11230-0000	
# of CHARGES 2	CO-DEFTS	POLICE CASE #:		DEFENDANT INFORMATION	
COMPLAINANT NAME: ELLIOT HIRSCH 7 SAXONY DRIVE OAKHURST NJ 07755			SEX: EYE COLOR: DOB: DL STATE: DRIVER'S LIC. #: SOCIAL SECURITY #: SBI #: TELEPHONE #: () LIVESCAN PCN #:		

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/11/2021 in OCEAN TWP, MONMOUTH County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, ADINA MILES HAS AN INSTAGRAM ACCOUNT CALLED "THE FLATBUSH GIRL." SHE HAS OVER 50,000 FOLLOWERS. ADINA MILES POSTED ON HER ACCOUNT TO COME PROTEST ME AND PUBLICLY HUMILIATE ME AND TRY TO GET ME ARRESTED. SHE WAS ABLE TO GATHER 60-80 PEOPLE TO COME PROTEST ME IN BROOKLYN, NY. AT THE PROTEST SHE ACCUSED ME OF BEING AN ABUSER AND STATED PUBLICLY SHE WOULD PROTEST AT MY HOME IN OAKHURST THE NEXT DAY MARCH 12, 2021 IF I DID NOT GIVE MY WIFE THE JEWISH DIVORCE. I RECIEVED ALL THESE HARRASMENT THREATS ON MY PHONE VIA INSTAGRAM WHILE AT MY HOME IN OAKHURST. THE PROTESTORS ARE CONFIRMED TO DAMAGE HOMES AND CAUSE CIVIL DISTURBANCES IN VIOLATION OF N.J.S.A. 2C:33-4C.

WITHIN THE JURISDICTION OF THIS COURT, ADINA MILES POSTED ON HER INSTRAGRAM ACCOUNT TO COME PROTEST AND HUMILAITE ME AND COME TO MY HOME TO HONK HORNS IF I DONT GIVE MY WIFE A JEWISH DIVORCE. ADINA MILES HAS 50,000 FOLLOWERS ON HER INSTAGRAM CALLED FLATBUSH GIRL. SHE STATED ON A VIDEO WHICH I RECIEVED WHILE AT in violation of:

Original Charge	1) 2C:33-4C	2) 2C:33-4A	3)
Amended Charge			

CERTIFICATION I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: 

Date: 6/22/21

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS

☐ Probable cause IS NOT found for the issuance of this complaint:

Signature of Court Administrator or Deputy Court Administrator

Date

Signature of Judge

Date

☒ Probable cause IS found for the issuance of this complaint-summons:

Signature of Judge

Date

SUMMONS

YOU ARE HEREBY SUMMONED to appear before the Municipal Court in the county of: MONMOUTH

at the following address: OCEAN TOWNSHIP MUNICIPAL COURT

399 MONMOUTH RD

OAKHURST

NJ 07755-0000

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

Date of Arrest:

Appearance Date: 07/13/2021

Time: 10:15AM

Phone: 732-531-5005

Signature of Person Issuing Summons: KAITLYN BELLARDINO JUDICIAL OFFICER

Date: 06/22/2021

☐ Domestic Violence - Confidential

☐ Related Traffic Tickets
or Other Complaints

☐ Serious Personal Injury/ Death
Involved

Special conditions of release:

- ☐ No phone, mail or other personal contact w/victim
☐ No possession firearms/weapons
☐ Other (specify):

ORIGINAL

COMPLAINT - SUMMONS**COMPLAINT NUMBER****1337****S****2021****000299****STATE V.**

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

MURRAY BETESH

OF A MOB WHICH CAUSED CIVIL DISTURBANCE AND SCREAMING AT EXTREMELY INCONVENIENT HOURS OF THE NIGHT. POLICE WERE INVOLVED. MURRAY ALSO THREATENED TO COME TO MY BLOCK AND PUT UP POSTERS OF ME AND HUMILIATE ME PUBLICLY. HE ALSO THREATENED TO PUT ME IN JAIL AND TO RELEASE INFORMATION ABOUT ME THAT WOULD "BRING ME DOWN." POLICE ADVISED ME IF I FOUND OUT WHO WAS AT THE PROTEST I COULD FILED CHARGES ON THEM INDIVIDUALLY IN VIOLATION OF N.J.S.A. 2C:33-4A.

WITHIN THE JURISDICTION OF THIS COURT, WITHIN THE JURISDICTION OF THIS COURT, MARCH 10, 2021 MURRAY STATED ON INSTAGRAM POSTED PUBLICLY IF I DONT GIVE MY WIFE A "GET" HE WOULD PUT ME IN JAIL LIKE HE DID SOMEONE ELSE THE PREVIOUS DAY. HE STATED HE HOPES FOR MY SAKE I GIVE THE "GET" BECAUSE "I PROMISE I WILL PUT ELLIOT IN JAIL! HE IS MY NEXT TARGET." MURRAY ALSO CAME TO MY HOUSE ON MARCH 10, 2021 IN ORDER TO GET THE JEWISH DIVORCE PAPERS FOR MY WIFE AND WAS PART OF A MOB OF ILLEGAL PROTESTORS SCREAMING AND HONKING AT AROUND 10 PM. MURRAY THEN ON MAY 30, 2021 SAID HE WILL COME TO MY BLOCK TO PUT UP POSTERS TO HUMILIATE ME IF I DONT WALK AWAY AND KEEP QUIET ABOUT WHAT HAPPENED TO ME IN VIOLATION OF N.J.S.A. 2C:33-4A.

WITHIN THE JURISDICTION OF THIS COURT, ON MARCH 10 MURRAY BETESH ON AN INSTAGRAM VIDEO POSTED PUBLICLY STATED THAT IF I DONT GIVE MY WIFE A "GET" THAT I WOULD BE PUT IN JAIL LIKE HE DID TO A DIFFERENT MAN PREVIOUSLY. HE SAID "I HOPE FOR HIS SAKE HE GAVE THE "GET" BECAUSE I PROMISE HE IS MY NEXT TARGET." THAT SAME NIGHT HE CAME TO MY HOME WITH A MOB OF ILLEGAL PROTESTORS "DEMANDING I GIVE MY WIFE A "GET"." HE WAS PRESENT AT THE PROTEST & STATED WHILE AT MY HOUSE, "I HOPE HE'S HOME," SO THAT HIS INTIMIDATION WOULD SUCCEED. THE MOB HE WAS A PART OF WERE HONKING HORNS & SMASHING CARS. THE NEXT DAY I GAVE MY WIFE THE "GET" DUE TO COERCION. ON MAY 30 HE PUBLICLY THREATENED ME AGAIN ON INSTAGRAM THAT HE WOULD RELEASE INFORMATION TO THE PUBLIC & PUT POSTERS ON MY BLOCK TO HUMILIATE ME IF I DONT "WALK AWAY." HE IS CRIMINALLY COERCING ME TO NOT BE ABLE TO ADVISE RABBI NIC AUTHORIZING THE DIVORCE I GAVE MY WIFE WAS DUE TO COERCION & IS INVALID PER JEWISH LAW. I CANT EXERCISE MY FREEDOM OF RELIGION IN VIOLATION OF 2C:33-4A.

COPY

Original Charge

4) 2C:33-4A

Amended Charge

COMPLAINT - SUMMONS

Page 2 of 11

NJ/CDR1 1/1/2017

COMPLAINT - SUMMONS

COMPLAINT NUMBER				THE STATE OF NEW JERSEY VS. MURRAY BETESH ADDRESS: 1190 LINCOLN AVE LONG BRANCH NJ 07740-0000	
1337	S	2021	000299		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005 COUNTY OF: MONMOUTH					
# of CHARGES	CO-DEFTS	POLICE CASE #:		DEFENDANT INFORMATION	
4				SEX: EYE COLOR: DOB:	DL STATE:
COMPLAINANT NAME: ELLIOT HIRSCH 7 SAXONY DRIVE OAKHURST NJ 07755				DRIVER'S LIC. #:	SBI #:
				SOCIAL SECURITY #:	()
				TELEPHONE #:	
				LIVESCAN PCN #:	
<p>By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/10/2021 in OCEAN TWP, MONMOUTH County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, MURRAY CAME TO MY HOME TO INTIMIDATE ME BY HONKING HORNS, TRYING TO "BREAK MY DOORS DOWN" AS STATED BY A FIELD REPORTED AND MURRAY SAID HE HOPES I WAS HOME. I HAVE VIDEO EVIDENCE OF HIM PRESENT AT AN ILLEGAL PROTEST. THE POLICE ADVISED ME I CAN FILE HARRASMENT CHARGES WHEN I FOUND OUT WHICH INDIVIDUALS WERE PRESENT AT THE PROTEST. MURRAY WAS THERE TO DEMAND I GIVE MY WIFE A JEWISH DIVORCE. HE CAME AT EXTREMELY INCONVENIENT HOURS AS REPORTED IN THE POLICE REPORT. HE CAUSED ME ANNOYANCE AND ALARM AND HE THEN THAT SAME NIGHT WENT ON INSTAGRAM AND SAID I AM HIS NEXT TARGET TO PUT IN JAIL IF I DONT GIVE MY WIFE THE JEWISH DIVORCE. HE THEN ON MAY 30, 2021 STATED HE IS COMING TO MY HOUSE TO PUT UP FLYERS SO THAT PEOPLE "DONT DO BUSINESS WITH ME" IN VIOLATION OF N.J.S.A. 2C:33-4C.</p> <p>WITHIN THE JURISDICTION OF THIS COURT, MURRAY CAME TO MY HOME AS A PART OF MOB OF ILLEGAL PROTESTORS TO FORCE ME TO GIVE MY WIFE A JEWISH DIVORCE. HE WAS PART in violation of:</p>					
Original Charge	1) 2C:33-4C		2) 2C:33-4A		3) 2C:33-4A
Amended Charge					
CERTIFICATION I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment. Signed: _____ Date: 06/22/21					
PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS					
<input type="checkbox"/> Probable cause IS NOT found for the issuance of this complaint: Signature of Court Administrator or Deputy Court Administrator _____ Date _____ Signature of Judge _____ Date _____					
<input checked="" type="checkbox"/> Probable cause IS found for the issuance of this complaint-summons: Signature of Judge _____ Date _____					
SUMMONS					
YOU ARE HEREBY SUMMONED to appear before the Municipal Court in the county of: MONMOUTH at the following address: OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest. Date of Arrest: _____ Appearance Date: 07/13/2021 Time: 10:15AM Phone: 732-531-5005					
Signature of Person Issuing Summons: KAITLYN BELLARDINO JUDICIAL OFFICER Date: 06/22/2021					
<input type="checkbox"/> Domestic Violence – Confidential		<input type="checkbox"/> Related Traffic Tickets or Other Complaints		<input type="checkbox"/> Serious Personal Injury/ Death Involved	
Special conditions of release: <input type="checkbox"/> No phone, mail or other personal contact w/victim <input type="checkbox"/> No possession firearms/weapons <input type="checkbox"/> Other (specify):				ORIGINAL	
				Page 1 of 11 NJ/CDR1 1/1/2017	

COMPLAINT - SUMMONS

COMPLAINT NUMBER				THE STATE OF NEW JERSEY	
1337	S	2021	000316	VS.	
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005 COUNTY OF: MONMOUTH				ADDRESS: 1090 LICOLN AVE LONG BRANCH NJ 07744-0000	
# of CHARGES 2	CO-DEFTS	POLICE CASE #:		DEFENDANT INFORMATION	
COMPLAINANT NAME: ELLIOT HIRSCH 7 SAXONY DRIVE OAKHURST NJ 07755			SEX: EYE COLOR: DOB: DL STATE:		
			DRIVER'S LIC. #:		
			SOCIAL SECURITY #:		
			TELEPHONE #:		
			LIVSCAN PCN #:		

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/10/2021 in OCEAN TWP, MONMOUTH County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, MURRAY CAME TO MY HOME AS PART OF A MOB TO BEAT ME UP, SMASH CARS AND BREAK MY DOORS DOWN TO GET MY TO GIVE MY WIFE A JEWISH DIVORCE. MURRAY SAID HE HOPED I WAS HOME. HE TIRED TO CAUSE ME BODILY INJURY BUT THE POLICE CAME AND GOT RID OF THE MOB IN VIOLATION OF N.J.S.A. 2C:12-1A(1).

WITHIN THE JURISDICTION OF THIS COURT, MURRAY CAME TO MY HOME AS PART OF A MOB OF ILLEGAL PROTESTORS THAT WERE TRYING TO BREAK MY DOOR DOWN TO BEAT ME UP TO GIVE MY WIFE A "GET." MURRAY SAID HE WISHED I WAS HOME. I RECEIVED SEVERAL THREATS OF A MOB COMING TO MY HOME TO GIVE ME A BEATING. MURRAY WAS AT MY HOME AND I HAVE VIDEO EVIDENCE IN VIOLATION OF N.J.S.A. 2C:12-1A(3).

in violation of:

Original Charge	1) 2C:12-1A(1)	2) 2C:12-1A(3)	3)
Amended Charge			

CERTIFICATION I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: [Signature]Date: 06/22/21**PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS**
☐ Probable cause **IS NOT** found for the issuance of this complaint:

Signature of Court Administrator or Deputy Court Administrator _____

Date _____

Signature of Judge _____

Date _____

☒ Probable cause **IS** found for the issuance of this complaint-summons:

Signature of Judge _____

Date _____

SUMMONSYOU ARE HEREBY **SUMMONED** to appear before the Municipal Court in the county of: MONMOUTH

at the following address: OCEAN TOWNSHIP MUNICIPAL COURT

399 MONMOUTH RD

OAKHURST

NJ 07755-0000

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

Date of Arrest:

Appearance Date: 07/13/2021

Time: 10:15AM

Phone: 732-531-5005

Signature of Person Issuing Summons: _____

KAITLYN

BELLARDINO JUDICIAL OFFICER

Date: 06/22/2021

☐ Domestic Violence – Confidential

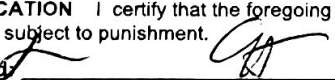
☐ Related Traffic Tickets
or Other Complaints

☐ Serious Personal Injury/ Death
Involved
Special conditions of release:

- ☐ No phone, mail or other personal contact w/victim
☐ No possession firearms/weapons
☐ Other (specify): _____

ORIGINAL

COMPLAINT - SUMMONS

COMPLAINT NUMBER				THE STATE OF NEW JERSEY VS. ELIZABETH KAIREY ADDRESS: 37 ROOSEVELT AVE OAKHURST NJ 07755-0000	
1337	S	2021	000314		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005 COUNTY OF: MONMOUTH					
# of CHARGES 1	CO-DEFTS	POLICE CASE #:		DEFENDANT INFORMATION SEX: EYE COLOR: DOB: DL STATE: DRIVER'S LIC. #: SOCIAL SECURITY #: SBI #: TELEPHONE #: () LIVESCAN PCN #:	
COMPLAINANT NAME: ELLIOT HIRSCH 7 SAXONY DRIVE OAKHURST NJ 07755					
By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/08/2021 in OCEAN TWP , MONMOUTH County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, WITH THE PURPOSE TO HARRAS ANOTHER, MAKE OR CAUSE TO BE MADE COMMUNICATION OR COMMUNICATIONS, IN A MANNER TO LIKELY CAUSE ANNOYANCE OR ALARM SPECIFICALLY BY MY WIFE APPROVED AND CAUSED A WEBSITE TO BE CREATED WITH MY NAME ON IT AND CAUSED COMMUNICATION TO BE MADE AT ME WHICH SPECIFICALLY THREATENED MY PHYSICAL SAFETY SUCH AS STATING "LETS BREAK HIS LEGS," "LETS MAKE A PHYSICAL GATHERING TO MAKE HIM GIVE THE GET," AND "ELLIOT IS EVIL." SHE HAS ADMITTED TO APPROVING THE WEBSITE WHICH BY DEFAULT MEANS SHE CAUSED THE COMMUNICATIONS TO BE MADE IN VIOLATION OF N.J.S.A. 2C:33-4(A).					
AFFIDVIT OF P/C					
in violation of:					
Original Charge	1) 2C:33-4A		2)	3)	
Amended Charge					
CERTIFICATION I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment. Signed:  Date: 6/22/21					
PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS					
<input type="checkbox"/> Probable cause IS NOT found for the issuance of this complaint: Signature of Court Administrator or Deputy Court Administrator _____ Date _____ Signature of Judge _____ Date _____					
<input checked="" type="checkbox"/> Probable cause IS found for the issuance of this complaint-summons: Signature of Judge _____ Date _____					
SUMMONS					
YOU ARE HEREBY SUMMONED to appear before the Municipal Court in the county of: MONMOUTH					
at the following address: OCEAN TOWNSHIP MUNICIPAL COURT					
399 MONMOUTH RD OAKHURST NJ 07755-0000					
If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.					
Date of Arrest: Appearance Date: 07/13/2021 Time: 10:15AM Phone: 732-531-5005					
Signature of Person Issuing Summons: KAITLYN BELLARDINO JUDICIAL OFFICER Date: 06/22/2021					
<input type="checkbox"/> Domestic Violence – Confidential		<input type="checkbox"/> Related Traffic Tickets or Other Complaints		<input type="checkbox"/> Serious Personal Injury/ Death Involved	
Special conditions of release: <input type="checkbox"/> No phone, mail or other personal contact w/victim <input type="checkbox"/> No possession firearms/weapons <input type="checkbox"/> Other (specify):				ORIGINAL	
				Page 1 of 7 NJ/CDR1 1/1/2017	

COMPLAINT - SUMMONS

COMPLAINT NUMBER				THE STATE OF NEW JERSEY VS. LAURIE BEDA	
1337	S	2021	000203		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	ADDRESS: 1047 STRATTON PLACE LONG BRANCH NJ 07744-0000	
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005					
# of CHARGES 1		CO-DEFTS	POLICE CASE #:	DEFENDANT INFORMATION	
COMPLAINANT NAME: ELLIOT HIRSCH 7 SAXONY DRIVE OAKHURST NJ 07755				SEX: EYE COLOR: DOB: DL STATE:	
				DRIVER'S LIC. #:	
				SOCIAL SECURITY #:	SBI #:
				TELEPHONE #: 718-314-7963 (c)	
				LIVSCAN PCN #:	

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/10/2021 in **OCEAN TWP**, **MONMOUTH County, NJ** did: WITHIN THE JURISDICTION OF THIS COURT, LAURIE BEDA INCITED AND URGED 700 PLUS PEOPLE TO COME TO MY HOME 7 SAXONY DR, OAKHURST, NJ, 07755 TO FORCE ME TO GIVE MY WIFE A "GET" THE JEWISH DIVORCE PAPERS. SHE SPECIFICALLY STATED TO BLAST THE MESSAGE DIRECTLY TO ME THAT I WOULD RECIEVE A MOB OF PROTESTORS TO GIVE ME A BEATING FOR THE "GET." THEN ON MARCH 10, 2021 THE MOB CAME TO MY HOME AND I STAYED IN THE POLICE STATION FO RMY PROTECTION. THE NEXT DAY LAURIE BEDA SAID IN A PUBLIC PARK THAT "IF HE (ME) DOESNT GIVE THE "GET" TODAY, WE (THE MOB) WILL BE AT HIS FATHERS WORK PLACE TOMORROW AND THEN MY HOME." THEREFORE, IN ORDER TO STAVE OFF THE MOB FROM COMING TO MY HOME AGAIN AND IN ORDER TO NOT RECIEVE THREATS OF BEATING AND VIOLENCE, WHICH I RECIEVED MANY, I GAVE THE "GET" ON MARCH 11, 2021 AT 8:20 PM. THE MOB IS CONFIRMED TO THROW EGGS AT HOMES AND BLOCK TRAFFIC, HONK HORNS AND CAUSE CIVIL DISTURBANCE IN VIOLATION OF N.J.S.A. 2C:13-5A(7). POLICE CASE NUMBER 21OT08268

in violation of:

Original Charge	1) 2C:13-5A(7)	2)	3)
Amended Charge			

CERTIFICATION I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: X

Date: X 6/7/21

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS

☐ Probable cause IS NOT found for the issuance of this complaint:

Signature of Court Administrator or Deputy Court Administrator

Date

Signature of Judge

Date

☒ Probable cause IS found for the issuance of this complaint-summons:

Signature of Judge

Date

SUMMONS

YOU ARE HEREBY SUMMONED to appear before the Superior Court in the county of: MONMOUTH

at the following address: MONMOUTH COUNTY COURTS

71 MONUMENT PARK

PO BOX 1271

FREEHOLD

NJ 07728-0000

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

Date of Arrest:

Appearance Date: 07/20/2021

Time: 09:30AM

Phone: 732-358-8700

Signature of Person Issuing Summons: TIMOTHY MCGOUGHAN JUDICIAL OFFICER

Date: 06/07/2021

☐ Domestic Violence – Confidential

☐ Related Traffic Tickets
or Other Complaints

☐ Serious Personal Injury/ Death
Involved

Special conditions of release:

- ☐ No phone, mail or other personal contact w/victim
☐ No possession firearms/weapons
☐ Other (specify):

ORIGINAL

Page 1 of 11

NJ/CDR1 1/1/2017

COMPLAINT - SUMMONS

COMPLAINT NUMBER			
1337	S	2021	000315
COURT CODE	PREFIX	YEAR	SEQUENCE NO.
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005 COUNTY OF: MONMOUTH			
# of CHARGES 2	CO-DEFTS	POLICE CASE #:	
COMPLAINANT NAME: ELLIOT HIRSCH 7 SAXONY DRIVE OAKHURST NJ 07755		THE STATE OF NEW JERSEY VS. LAURIE BEDA ADDRESS: 1047 STRATON PLACE LONG BRANCH NJ 07744-0000 DEFENDANT INFORMATION SEX: EYE COLOR: DOB: DRIVER'S LIC. #: DL STATE: SOCIAL SECURITY #: SBI #: TELEPHONE #: 718-314-7963 (C) LIVSCAN PCN #:	

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/10/2021 in OCEAN TWP, MONMOUTH County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, LAURIE BEDA PARTICIPATED IN A ILLEGAL MOB OF PROTESTORS AND THEN STATED PUBLICLY SHE WOULD COME TO MY HOME TO CAUSE A CIVIL DISTURBANCE, BLOW HORNS AND THROW EGGS IF I DID NOT GIVE MY WIFE A "GET." I HAVE VIDEO EVIDENCE OF THE MOB THROWING EGGS AND CAUSING CIVIL DISTURBANCE IN VIOLATION OF N.J.S.A. 2C:33-2A(1)

WITHIN THE JURISDICTION OF THIS COURT, LAURIE BEDA THREATENED TO COME TO MY HOME AND THREATENED TO BRING A MOB OF VIOLENT PROTESTORS TO MY HOUSE, WHICH CAUSED ME TO FLEE MY HOME AND HIDE IN THE OCEAN TOWNSHIP POLICE STATION THE NIGHT OF 03/10/2021. SHE BROUGHT A MOB OF PEOPLE TO MY HOME WHICH THE POLICE DEPARTMENT CONFIRMING THAT IT CAUSED A CIVIL DISTURBANCE. SHE ALSO THREATENED TO DO IT AGAIN ON 03/11/2021 IF I DID NOT GIVE MY WIFE A "GET" IN VIOLATION OF N.J.S.A. 2C:33-4A

in violation of:

Original Charge	1) 2C:33-2A(1) 2C:5-1C	2) 2C:33-4A	3)
Amended Charge			

CERTIFICATION I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: 

Date: 6/22/21

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS

☐ Probable cause IS NOT found for the issuance of this complaint:

Signature of Court Administrator or Deputy Court Administrator

Date

Signature of Judge

Date

☒ Probable cause IS found for the issuance of this complaint-summons:

Signature of Judge

Date

SUMMONS

YOU ARE HEREBY SUMMONED to appear before the Municipal Court in the county of: MONMOUTH

at the following address: OCEAN TOWNSHIP MUNICIPAL COURT

399 MONMOUTH RD

OAKHURST

NJ 07755-0000

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

Date of Arrest:

Appearance Date: 07/13/2021

Time: 10:15AM

Phone: 732-531-5005

Signature of Person Issuing Summons: KAITLYN BELLARDINO JUDICIAL OFFICER

Date: 06/22/2021

☐ Domestic Violence – Confidential

☐ Related Traffic Tickets
or Other Complaints

☐ Serious Personal Injury/ Death
Involved

Special conditions of release:

- ☐ No phone, mail or other personal contact w/victim
☐ No possession firearms/weapons
☐ Other (specify):

ORIGINAL

Page 1 of 11

NJ/CDR1 1/1/2017

COMPLAINT - SUMMONS

COMPLAINT NUMBER				THE STATE OF NEW JERSEY VS. ADINA MILES	
1337	S	2021	000289		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005 COUNTY OF: MONMOUTH				ADDRESS: 1416 E 16TH STREET BROOKLYN NY 11230-0000	
# of CHARGES 2	CO-DEFTS	POLICE CASE #:		DEFENDANT INFORMATION	
COMPLAINANT NAME: ELLIOT HIRSCH 7 SAXONY DRIVE OAKHURST NJ 07755			SEX: EYE COLOR: DOB: DL STATE: DRIVER'S LIC. #: SOCIAL SECURITY #: SBI #: TELEPHONE #: () LIVESCAN PCN #:		

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/11/2021 in OCEAN TWP, MONMOUTH County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, ADINA MILES HAS AN INSTAGRAM ACCOUNT CALLED "THE FLATBUSH GIRL." SHE HAS OVER 50,000 FOLLOWERS. ADINA MILES POSTED ON HER ACCOUNT TO COME PROTEST ME AND PUBLICLY HUMILIATE ME AND TRY TO GET ME ARRESTED. SHE WAS ABLE TO GATHER 60-80 PEOPLE TO COME PROTEST ME IN BROOKLYN, NY. AT THE PROTEST SHE ACCUSED ME OF BEING AN ABUSER AND STATED PUBLICLY SHE WOULD PROTEST AT MY HOME IN OAKHURST THE NEXT DAY MARCH 12, 2021 IF I DID NOT GIVE MY WIFE THE JEWISH DIVORCE. I RECIEVED ALL THESE HARRASMENT THREATS ON MY PHONE VIA INSTAGRAM WHILE AT MY HOME IN OAKHURST. THE PROTESTORS ARE CONFIRMED TO DAMAGE HOMES AND CAUSE CIVIL DISTURBANCES IN VIOLATION OF N.J.S.A. 2C:33-4C.

WITHIN THE JURISDICTION OF THIS COURT, ADINA MILES POSTED ON HER INSTRAGRAM ACCOUNT TO COME PROTEST AND HUMILAITE ME AND COME TO MY HOME TO HONK HORNS IF I DONT GIVE MY WIFE A JEWISH DIVORCE. ADINA MILES HAS 50,000 FOLLOWERS ON HER INSTAGRAM CALLED FLATBUSH GIRL. SHE STATED ON A VIDEO WHICH I RECIEVED WHILE AT in violation of:

Original Charge	1) 2C:33-4C	2) 2C:33-4A	3)
Amended Charge			

CERTIFICATION I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: 

Date: 6/22/21

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS

☐ Probable cause IS NOT found for the issuance of this complaint:

Signature of Court Administrator or Deputy Court Administrator

Date

Signature of Judge

Date

☒ Probable cause IS found for the issuance of this complaint-summons:

Signature of Judge

Date

SUMMONS

YOU ARE HEREBY SUMMONED to appear before the Municipal Court in the county of: MONMOUTH

at the following address: OCEAN TOWNSHIP MUNICIPAL COURT

399 MONMOUTH RD

OAKHURST

NJ 07755-0000

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

Date of Arrest:

Appearance Date: 07/13/2021

Time: 10:15AM

Phone: 732-531-5005

Signature of Person Issuing Summons: KAITLYN BELLARDINO JUDICIAL OFFICER

Date: 06/22/2021

☐ Domestic Violence - Confidential

☐ Related Traffic Tickets
or Other Complaints

☐ Serious Personal Injury/ Death
Involved

Special conditions of release:

- ☐ No phone, mail or other personal contact w/victim
☐ No possession firearms/weapons
☐ Other (specify):

ORIGINAL

COMPLAINT - SUMMONS**COMPLAINT NUMBER****1337****S****2021****000299****STATE V.**

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

MURRAY BETESH

OF A MOB WHICH CAUSED CIVIL DISTURBANCE AND SCREAMING AT EXTREMELY INCONVENIENT HOURS OF THE NIGHT. POLICE WERE INVOLVED. MURRAY ALSO THREATENED TO COME TO MY BLOCK AND PUT UP POSTERS OF ME AND HUMILIATE ME PUBLICLY. HE ALSO THREATENED TO PUT ME IN JAIL AND TO RELEASE INFORMATION ABOUT ME THAT WOULD "BRING ME DOWN." POLICE ADVISED ME IF I FOUND OUT WHO WAS AT THE PROTEST I COULD FILED CHARGES ON THEM INDIVIDUALLY IN VIOLATION OF N.J.S.A. 2C:33-4A.

WITHIN THE JURISDICTION OF THIS COURT, WITHIN THE JURISDICTION OF THIS COURT, MARCH 10, 2021 MURRAY STATED ON INSTAGRAM POSTED PUBLICLY IF I DONT GIVE MY WIFE A "GET" HE WOULD PUT ME IN JAIL LIKE HE DID SOMEONE ELSE THE PREVIOUS DAY. HE STATED HE HOPES FOR MY SAKE I GIVE THE "GET" BECAUSE "I PROMISE I WILL PUT ELLIOT IN JAIL! HE IS MY NEXT TARGET." MURRAY ALSO CAME TO MY HOUSE ON MARCH 10, 2021 IN ORDER TO GET THE JEWISH DIVORCE PAPERS FOR MY WIFE AND WAS PART OF A MOB OF ILLEGAL PROTESTORS SCREAMING AND HONKING AT AROUND 10 PM. MURRAY THEN ON MAY 30, 2021 SAID HE WILL COME TO MY BLOCK TO PUT UP POSTERS TO HUMILIATE ME IF I DONT WALK AWAY AND KEEP QUIET ABOUT WHAT HAPPENED TO ME IN VIOLATION OF N.J.S.A. 2C:33-4A.

WITHIN THE JURISDICTION OF THIS COURT, ON MARCH 10 MURRAY BETESH ON AN INSTAGRAM VIDEO POSTED PUBLICLY STATED THAT IF I DONT GIVE MY WIFE A "GET" THAT I WOULD BE PUT IN JAIL LIKE HE DID TO A DIFFERENT MAN PREVIOUSLY. HE SAID "I HOPE FOR HIS SAKE HE GAVE THE "GET" BECAUSE I PROMISE HE IS MY NEXT TARGET." THAT SAME NIGHT HE CAME TO MY HOME WITH A MOB OF ILLEGAL PROTESTORS "DEMANDING I GIVE MY WIFE A "GET"." HE WAS PRESENT AT THE PROTEST & STATED WHILE AT MY HOUSE, "I HOPE HE'S HOME," SO THAT HIS INTIMIDATION WOULD SUCCEED. THE MOB HE WAS A PART OF WERE HONKING HORNS & SMASHING CARS. THE NEXT DAY I GAVE MY WIFE THE "GET" DUE TO COERCION. ON MAY 30 HE PUBLICLY THREATENED ME AGAIN ON INSTAGRAM THAT HE WOULD RELEASE INFORMATION TO THE PUBLIC & PUT POSTERS ON MY BLOCK TO HUMILIATE ME IF I DONT "WALK AWAY." HE IS CRIMINALLY COERCING ME TO NOT BE ABLE TO ADVISE RABBI NIC AUTHORIZING THE DIVORCE I GAVE MY WIFE WAS DUE TO COERCION & IS INVALID PER JEWISH LAW. I CANT EXERCISE MY FREEDOM OF RELIGION IN VIOLATION OF 2C:33-4A.

COPY

Original Charge

4) 2C:33-4A

Amended Charge

COMPLAINT - SUMMONS

Page 2 of 11

NJ/CDR1 1/1/2017

COMPLAINT - SUMMONS

COMPLAINT NUMBER				THE STATE OF NEW JERSEY VS. MURRAY BETESH ADDRESS: 1190 LINCOLN AVE LONG BRANCH NJ 07740-0000	
1337	S	2021	000299		
<small>COURT CODE</small>	<small>PREFIX</small>	<small>YEAR</small>	<small>SEQUENCE NO.</small>		
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005 COUNTY OF: MONMOUTH					
# of CHARGES 4	CO-DEFTS	POLICE CASE #:		DEFENDANT INFORMATION SEX: EYE COLOR: DOB: DL STATE: DRIVER'S LIC. #: SOCIAL SECURITY #: TELEPHONE #: LIVESCAN PCN #:	
COMPLAINANT NAME: ELLIOT HIRSCH 7 SAXONY DRIVE OAKHURST NJ 07755					
By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/10/2021 in OCEAN TWP , MONMOUTH County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, MURRAY CAME TO MY HOME TO INTIMIDATE ME BY HONKING HORNS, TRYING TO "BREAK MY DOORS DOWN" AS STATED BY A FIELD REPORTED AND MURRAY SAID HE HOPES I WAS HOME. I HAVE VIDEO EVIDENCE OF HIM PRESENT AT AN ILLEGAL PROTEST. THE POLICE ADVISED ME I CAN FILE HARRASMENT CHARGES WHEN I FOUND OUT WHICH INDIVIDUALS WERE PRESENT AT THE PROTEST. MURRAY WAS THERE TO DEMAND I GIVE MY WIFE A JEWISH DIVORCE. HE CAME AT EXTREMELY INCONVENIENT HOURS AS REPORTED IN THE POLICE REPORT. HE CAUSED ME ANNOYANCE AND ALARM AND HE THEN THAT SAME NIGHT WENT ON INSTAGRAM AND SAID I AM HIS NEXT TARGET TO PUT IN JAIL IF I DONT GIVE MY WIFE THE JEWISH DIVORCE. HE THEN ON MAY 30, 2021 STATED HE IS COMING TO MY HOUSE TO PUT UP FLYERS SO THAT PEOPLE "DONT DO BUSINESS WITH ME" IN VIOLATION OF N.J.S.A. 2C:33-4C.					
WITHIN THE JURISDICTION OF THIS COURT, MURRAY CAME TO MY HOME AS A PART OF MOB OF ILLEGAL PROTESTORS TO FORCE ME TO GIVE MY WIFE A JEWISH DIVORCE. HE WAS PART in violation of:					
Original Charge	1) 2C:33-4C	2) 2C:33-4A	3) 2C:33-4A		
Amended Charge					
CERTIFICATION I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment. Signed: _____ Date: 06/22/21					
PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS					
<input type="checkbox"/> Probable cause IS NOT found for the issuance of this complaint: Signature of Court Administrator or Deputy Court Administrator _____ Date _____ Signature of Judge _____ Date _____					
<input checked="" type="checkbox"/> Probable cause IS found for the issuance of this complaint-summons: Signature of Judge _____ Date _____					
SUMMONS YOU ARE HEREBY SUMMONED to appear before the Municipal Court in the county of: MONMOUTH at the following address: OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest. Date of Arrest: Appearance Date: 07/13/2021 Time: 10:15AM Phone: 732-531-5005 Signature of Person Issuing Summons: KAITLYN BELLARDINO JUDICIAL OFFICER Date: 06/22/2021					
<input type="checkbox"/> Domestic Violence – Confidential		<input type="checkbox"/> Related Traffic Tickets or Other Complaints		<input type="checkbox"/> Serious Personal Injury/ Death Involved	
Special conditions of release: <input type="checkbox"/> No phone, mail or other personal contact w/victim <input type="checkbox"/> No possession firearms/weapons <input type="checkbox"/> Other (specify):				ORIGINAL	
				Page 1 of 11 NJ/CDR1 1/1/2017	

COMPLAINT - SUMMONS

COMPLAINT NUMBER			
1337	S	2021	000316
COURT CODE	PREFIX	YEAR	SEQUENCE NO.
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005 COUNTY OF: MONMOUTH			
# of CHARGES 2	CO-DEFTS	POLICE CASE #:	
COMPLAINANT NAME: ELLIOT HIRSCH 7 SAXONY DRIVE OAKHURST NJ 07755		DEFENDANT INFORMATION SEX: EYE COLOR: DOB: DL STATE: DRIVER'S LIC. #: SOCIAL SECURITY #: TELEPHONE #: SBI #: LIVESCAN PCN #: ()	

THE STATE OF NEW JERSEY**VS.****MURRAY BETESH**ADDRESS: **1090 LICOLN AVE****LONG BRANCH NJ 07744-0000**

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about **03/10/2021** in **OCEAN TWP**, **MONMOUTH County, NJ** did: WITHIN THE JURISDICTION OF THIS COURT, MURRAY CAME TO MY HOME AS PART OF A MOB TO BEAT ME UP, SMASH CARS AND BREAK MY DOORS DOWN TO GET MY TO GIVE MY WIFE A JEWISH DIVORCE. MURRAY SAID HE HOPED I WAS HOME. HE TIRED TO CAUSE ME BODILY INJURY BUT THE POLICE CAME AND GOT RID OF THE MOB IN VIOLATION OF N.J.S.A. 2C:12-1A(1).

WITHIN THE JURISDICTION OF THIS COURT, MURRAY CAME TO MY HOME AS PART OF A MOB OF ILLEGAL PROTESTORS THAT WERE TRYING TO BREAK MY DOOR DOWN TO BEAT ME UP TO GIVE MY WIFE A "GET." MURRAY SAID HE WISHED I WAS HOME. I RECEIVED SEVERAL THREATS OF A MOB COMING TO MY HOME TO GIVE ME A BEATING. MURRAY WAS AT MY HOME AND I HAVE VIDEO EVIDENCE IN VIOLATION OF N.J.S.A. 2C:12-1A(3).

in violation of:

Original Charge	1) 2C:12-1A(1)	2) 2C:12-1A(3)	3)
Amended Charge			

CERTIFICATION I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: Date: **06/22/21****PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS**
☐ Probable cause **IS NOT** found for the issuance of this complaint:

Signature of Court Administrator or Deputy Court Administrator

Date

Signature of Judge

Date

☒ Probable cause **IS** found for the issuance of this complaint-summons:

Signature of Judge

Date

SUMMONS

YOU ARE HEREBY **SUMMONED** to appear before the Municipal Court in the county of: **MONMOUTH**

at the following address: **OCEAN TOWNSHIP MUNICIPAL COURT****399 MONMOUTH RD****OAKHURST****NJ 07755-0000**

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

Date of Arrest: Appearance Date: **07/13/2021** Time: **10:15AM** Phone: **732-531-5005**Signature of Person Issuing Summons: **KAITLYN BELLARDINO****JUDICIAL OFFICER**Date: **06/22/2021**
☐ **Domestic Violence – Confidential**
☐ **Related Traffic Tickets or Other Complaints**
☐ **Serious Personal Injury/ Death Involved**
Special conditions of release:

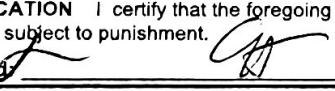
- ☐ **No phone, mail or other personal contact w/victim**
☐ **No possession firearms/weapons**
☐ **Other (specify):**

ORIGINAL

Page 1 of 7

NJ/CDR1 1/1/2017

COMPLAINT - SUMMONS

COMPLAINT NUMBER				THE STATE OF NEW JERSEY VS. ELIZABETH KAIREY ADDRESS: 37 ROOSEVELT AVE OAKHURST NJ 07755-0000	
1337	S	2021	000314		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005 COUNTY OF: MONMOUTH					
# of CHARGES 1	CO-DEFTS	POLICE CASE #:		DEFENDANT INFORMATION SEX: EYE COLOR: DOB: DL STATE: DRIVER'S LIC. #: SOCIAL SECURITY #: SBI #: TELEPHONE #: () LIVESCAN PCN #:	
COMPLAINANT NAME: ELLIOT HIRSCH 7 SAXONY DRIVE OAKHURST NJ 07755					
By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/08/2021 in OCEAN TWP , MONMOUTH County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, WITH THE PURPOSE TO HARRAS ANOTHER, MAKE OR CAUSE TO BE MADE COMMUNICATION OR COMMUNICATIONS, IN A MANNER TO LIKELY CAUSE ANNOYANCE OR ALARM SPECIFICALLY BY MY WIFE APPROVED AND CAUSED A WEBSITE TO BE CREATED WITH MY NAME ON IT AND CAUSED COMMUNICATION TO BE MADE AT ME WHICH SPECIFICALLY THREATENED MY PHYSICAL SAFETY SUCH AS STATING "LETS BREAK HIS LEGS," "LETS MAKE A PHYSICAL GATHERING TO MAKE HIM GIVE THE GET," AND "ELLIOT IS EVIL." SHE HAS ADMITTED TO APPROVING THE WEBSITE WHICH BY DEFAULT MEANS SHE CAUSED THE COMMUNICATIONS TO BE MADE IN VIOLATION OF N.J.S.A. 2C:33-4(A).					
AFFIDVIT OF P/C					
in violation of:					
Original Charge	1) 2C:33-4A		2)	3)	
Amended Charge					
CERTIFICATION I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment. Signed:  Date: 6/22/21					
PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS					
<input type="checkbox"/> Probable cause IS NOT found for the issuance of this complaint: Signature of Court Administrator or Deputy Court Administrator _____ Date _____ Signature of Judge _____ Date _____					
<input checked="" type="checkbox"/> Probable cause IS found for the issuance of this complaint-summons: Signature of Judge _____ Date _____					
SUMMONS					
YOU ARE HEREBY SUMMONED to appear before the Municipal Court in the county of: MONMOUTH					
at the following address: OCEAN TOWNSHIP MUNICIPAL COURT					
399 MONMOUTH RD OAKHURST NJ 07755-0000					
If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.					
Date of Arrest: Appearance Date: 07/13/2021 Time: 10:15AM Phone: 732-531-5005					
Signature of Person Issuing Summons: KAITLYN BELLARDINO JUDICIAL OFFICER Date: 06/22/2021					
<input type="checkbox"/> Domestic Violence – Confidential		<input type="checkbox"/> Related Traffic Tickets or Other Complaints		<input type="checkbox"/> Serious Personal Injury/ Death Involved	
Special conditions of release: <input type="checkbox"/> No phone, mail or other personal contact w/victim <input type="checkbox"/> No possession firearms/weapons <input type="checkbox"/> Other (specify):				ORIGINAL	
				Page 1 of 7 NJ/CDR1 1/1/2017	



Township of Ocean Police NJ0133700

399 Monmouth Road OAKHURST, NJ 07755 (732)531-1800

Officer Report for Incident 21OT04466

Nature: DOMESTIC
Location: P373

Address: 7 SAXONY DR
OCEAN TWP NJ 07712

Offense Codes: HARR

Received By: Kanarkowski, E

How Received: T

Agency: P37

Responding Officers: Redmond II, K, Bernhard, Bre, Bones, J, Abbott, M, Larkins, J, Kane, K, Orbach, J, Martone, G, Legg, M, Stenger, C

Responsible Officer: Bones, J

Disposition: CLO 03/11/21

When Reported: 22:07:18 03/10/21

Occurred Between: 22:03:35 03/10/21 and 22:03:35 03/10/21

Assigned To:

Detail:

Date Assigned: **/**/**

Status:

Status Date: **/**/**

Due Date: **/**/**

Complainant:

Last:

First:

Mid:

DOB: **/**/**

Dr Lic:

Address:

Race:

Sex:

Phone:

City: ,

Offense Codes

Reported:

Observed:

Additional Offense: HARR Harassment

Circumstances

Responding Officers:

Unit :

Redmond II, K

P37261

Bernhard, Bre

P37289

Bones, J

P37296

Abbott, M

P37302

Larkins, J

P37291

Kane, K

P37285

Orbach, J

P37275

Martone, G

P37268

Legg, M

P37254

Stenger, C

P37288

Responsible Officer: Bones, J

Agency: P37

Officer Report for Incident 21OT04466

Page 2 of 7

Received By: Kanarkowski, E
How Received: T Telephone
When Reported: 22:07:18 03/10/21
Judicial Status:
Misc Entry:

Last Radio Log: 03:49:23 03/11/21 C
Clearance: RR Report Required
Disposition: CLO **Date:** 03/11/21
Occurred between: 22:03:35 03/10/21
and: 22:03:35 03/10/21

Statute:**Description :****Method :****Involvements**

Date	Type	Description	
03/10/21	Name	HIRSCH, ELLIOT M	Victim
03/10/21	Cad Call	22:07:18 03/10/21 DOMESTIC	Initiating Call

Officer Report for Incident 21OT04466

Page 3 of 7

Narrative

Narrative By: Ptl. Bones #296 BWC: 19 Date: 3/10/21

Assisting Patrolman: Ptl. Larkins #291 BWC: 24
 Ptl. Jones #302 BWC: 21
 Ptl. Bernhard #289 BWC: 16
 Ptl. Stenger #288 BWC: 20
 Ptl. Redmond #261 BWC: 10
 Ptl. Kane #285 BWC: 15
 Ptl. DeSimone #227 BWC: 18
 Sgt. Martone #268 BWC: 23
 Sgt. Orbach #275 BWC: 36

Crime: 2C:33-4 / Harassment

MO: Offender harassed the victim by allegedly inciting a protest at his residence in Ocean Twp NJ.

On 3/10/21 at approximately 2207 hours, Ptl. Larkins #291, Ptl. Jones #302, Ptl. Bernhard #289, Ptl. Stenger #288, Ptl. Redmond #261, Ptl. Kane #285, Ptl. DeSimone #227, Sgt. Martone #268, Sgt. Orbach #275 and I responded to the area of 7 Saxony Drive for a report of a large crowd outside of the residence. Upon arrival we observed numerous vehicles parked in the roadway, obstructing the flow of traffic as well as pedestrians standing on the sidewalks. While attempting to gather information, people began to loudly chant "give her a GET". A GET is paperwork in the Jewish Community which allows a divorce to be finalized. While chanting, vehicles began to beep their horns, waking residents and causing complaints for noise. Patrols were able to disburse the crowd as well as issue motor vehicle summonses for (39:3-69 / Improper Use of Horn). All protesters were advised to disperse and leave the area, due to the obstruction of the roadway and noise complaints. All protesters were advised to contact the Township of Ocean to obtain a permit to assemble and protest legally. After the protesters were dispersed, Ptl. Redmond #261 and I performed a building check of the residence and confirmed that all doors were locked and there was no damage to the property.

I responded to headquarters to speak with the complainant, Elliot Hirsch. Elliot informed me that he and his ex-wife Elizabeth Kairey are currently in the process of divorce. Elliot believes that Elizabeth incited this protest but was not able to provide me physical evidence. Elliot stated that Elizabeth met with him on either February 23 or 24 at a bagel shop in Brooklyn NY. During this conversation, they discussed their divorce. While conversing, Elliot alleged that Elizabeth stated she would send people after him if she did not receive a GET. Elliot believes this protest is a result of their February 23rd or 24th conversation. Elliot advised he wished to apply for a Temporary Restraining Order due to Harassment. Elliot informed me that he has not resided with Elizabeth for approximately 4 years but to his knowledge she does not currently own any weapons or have a Firearms Identification Card. Elizabeth was checked for firearms via NCIC with negative results.

I contacted Elizabeth via telephone to confirm that she was ok, due to the protesters chanting her name and well as Elliot's. Elizabeth informed me that she was ok. Elizabeth stated she was unaware of the protest and further advised me that she did not ask people to gather or post Elliot's personal address on the internet. Elizabeth stated that they have been in the divorce process for awhile and have had similar issues in the past. I asked Elizabeth about their child and she informed me that she was ok and would not provide me with any

Officer Report for Incident 21OT04466

Page 4 of 5

further information for this incident.

Elliot was advised of his Rights under the NJ Domestic Violence Act. Elliot indicated that he understood and wished to apply for a Temporary Restraining Order. He signed the form indicating same. Elliot spoke with Judge McGoughran via telephone and a TRO was granted. I advised Elliot that he was eligible to speak with a Domestic Violence Response Team Member which he declined at this time. Elliot was provided a copy of the TRO. Elliot was advised of the complaint signing process for NJ and NY.

I completed a Victim Notification Form, OADAR Form, NJ Domestic Violence Supplementary Form and a Handle With Care Form. All forms are included in the case file. The Handle With Care Form was e-mailed to LEAH@OROTSARAH.COM.

All Digital evidence was tagged and downloaded to the case.

No further action taken.

Officer Report for Incident 21OT04466

Page 7 of 7

Name Involvements:

Victim : 656190

Last: HIRSCH

DOB: 08/01/87

Race: W

Sex: M

First: ELLIOT

Dr Lic: H461621474088

72

Phone: (917)750-0418

Mid: M

Address: 7 SAXONY DR

City: OAKHURST, NJ 07755-1623

LATEST CAMPAIGNS

FOR ORGANIZATIONS

SUPPORT

TheChesedFund



Elizabeth is Free!





\$128,353.29

donated by 1066 people

Goal: \$150,000

Donate

Share Campaign

THANK YOU EVERYBODY FOR YOUR AMAZING SUPPORT!

We've raised a significant amount of money for Elizabeth and she is officially free!! Baruch Hashem!

THIS CAMPAIGN IS ENDORSED BY:

RABBI ELI MANSOUR- Head Rabbi of Edmond J. Safra Synagogue in Brooklyn, NY

RABBI HAROLD SUTTON- Rosh HaYeshivah of the Sephardic Rabbinical College, Magen David Yeshivah and Yeshivat Moreshet Yerushalayim, in Israel.

RABBI TIDHAR COHEN- Beit Horaah 'Emet Vasedek', Brooklyn, NY

RABBI MAX SUTTON Rosh Beit Din Aram Soba Jerusalem, Israel

All donations are tax deductible.

PLEASE DO NOT POST ANY NEGATIVE COMMENTS

HELP FREE ELIZABETH! A young woman in our community who has been refused a GET for almost 4 years and needs her life back!

She has accumulated lawyer's fees surrounding the case and has a 4 year old child to support on her own.

She has been refused child support and her freedom, despite the direction of the Beit Din.

She needs our help with living expenses, lawyer fees, tuition for her child, summer camp and clothing for her child.

She works as a teacher in a community school.

Her family gives her all they could, but unfortunately it is not enough to cover her debts, especially given the mounting lawyer fees.

REFUSING A GET IS ABUSE AND IT NEEDS TO STOP!

We need to help her stay strong and help alleviate this financial burden!

Any amount will help. Please pray for her freedom (Chaviva Mazal bat Chava).

#FREEELIZABETH

Created By



TAX

DEDUCTIBLE



The Edmond J. Safra Synagogue Inc C/O Jacob S. Kassin Hessed Fund

The Edmond J. Safra Synagogue Inc C/O Jacob S. Kassin Hessed Fund
1801 Ocean Parkway
Brooklyn, NY

Tax ID: 205569592

Contact Organizer

communityagunahfund@gmail.com

Recent Donations

	effective amount ^
<div>Anonymous Donor</div> <div>1 day ago</div> <div><i>Much hatzlaha to this wonderful family. May hashem repay them thousand fold and may Elizabeth begin a new future with this great FREEDOM.</i></div>	\$1,000
<div>Abraham Shiloach</div> <div>1 day ago</div> <div><i>In memory of molly shiloach Elizabeth you are a superstar bh aunt molly would be so proud</i></div>	\$2,601
<div>Anonymous Donor</div> <div>1 day ago</div> <div></div>	\$29
<div>Malky Rosenberg</div> <div>1 day ago</div> <div><i>L'zechus refuah shelaimah for Yehudis bas Esther</i></div>	\$1
<div>Anonymous Donor</div> <div>2 days ago</div> <div></div>	\$100
<div>Joey Khasky</div> <div>2 days ago</div> <div></div>	\$21

ELIZABETH IS FREE! Flatbush Agunah Receives Get As Momentum Builds To Support Trapped Women

March 11, 2021 11:47 pm



By Shmiel Soiferman

Who says social media is bad?

Social media and the rallies that social media have brought about – have accomplished the near impossible – pressuring recalcitrant husbands into giving a get.

The case in point, Elizabeth K., a woman living in Brooklyn, who has been waiting four years to receive her get, got it earlier tonight. Instagram was particularly effective in this get – because there is a newly empowered group of Influencers on Instagram that arranged an impromptu rally.

The rally was held this morning at one venue and went to another.

“People came out of the woodworks,” remarked Avi David, who observed the rally. “The rally was actually planned, but many other women showed up because it went viral on Instagram and everyone’s Facebook page,” he continued.

TODAY AT THE #FREEELIZABETH RALLY ON OCEAN AVENUE I SPOKE HOW WE MUST HELP THESE WOMEN & HOW WE CAN LEVEL UP OUR LEGAL/LEGISLATIVE APPROACH IN A MANNER THAT DOESN'T CONFLICT WITH OUR RELIGIOUS BELIEFS. THERE ARE REAL OPTIONS AND I WILL DISCUSS THEM MORE IN DETAIL ON SOCIAL SOON.
PIC.TWITTER.COM/J95MKYCGYL

— AMBER ADLER (@AMBERADLERNYC) MARCH 11, 2021

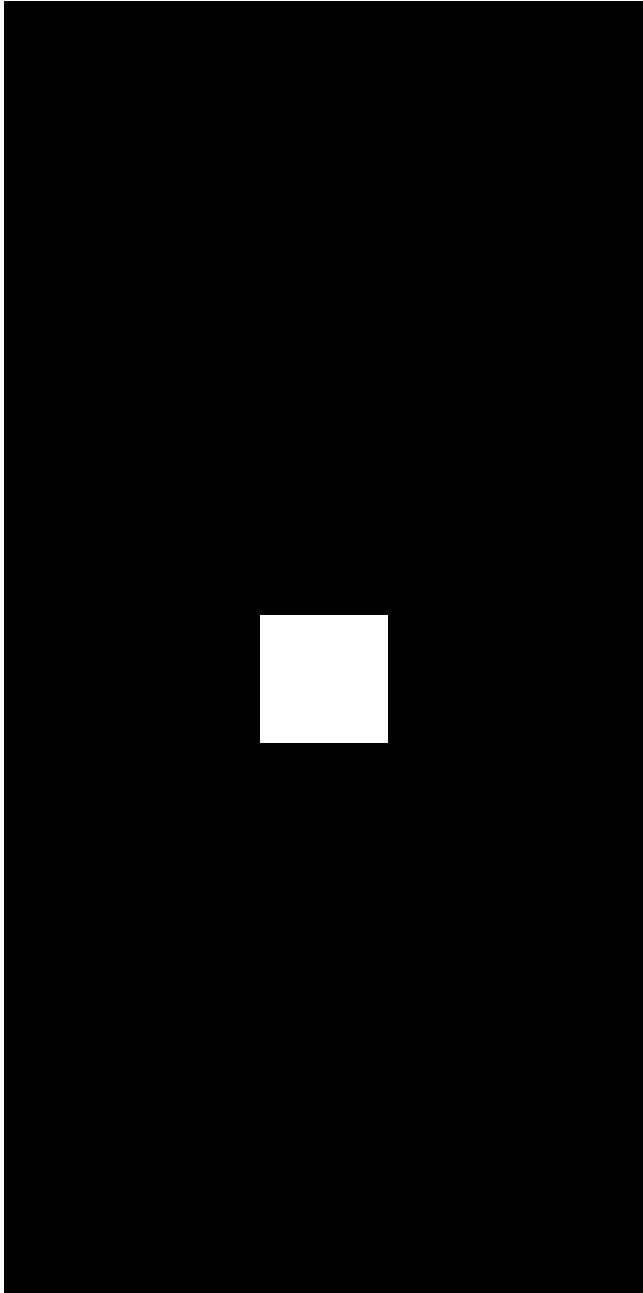
<https://twitter.com/brachashap/status/1370185847287463942>

There is evidence as well that the rally proved effective. Rabbi David Ozeri, one of the leading Rabbonim in the Syrian community appeared at the event and asked the women to stop the rally, explaining that in fact he will be meeting with the husband at 3 PM to try to obtain a Get. The women asked him what their recourse will be if the Get is not given. Rabbi Ozeri answered that in that in case he will come back the following day and lead the protest.

Sure enough, a Kosher Get was facilitated several hours later by rabbi Ozeri at the home of of Mr. Harry Adjmi, one of the pillars of the Sephardic community in Flatbush.

PIC.TWITTER.COM/TP5RPAFCML

— BRACHA KAHANE (@BRACHASHAP) MARCH 11, 2021



00:00

00:12

There is growing social media pressure on other cases as well: Yechiel Friedman is a case in point. Yechiel Friedman has been legally divorced for close to eighteen years. The actual Seruv was only issued in 2013 – by the Beis Din of America. David Nahmmany has an active social campaign going on now and is listed on Ora, a leading advocacy organization dedicated to relieving the plight of Agunos. There are two more cases that are found on Ora's website, www.Getora.org that deserve greater recognition.

- David Nachmani and his wife have had a legal divorce since 2007. There is a siruv against him from Beis Din of America. His wife has been an Agunah for 13 and ½ years.
- Moshe Stern has been separated from his wife Patricia since 1995 – that's 26 years. Patricia lives in Israel. Moshe Stern moves around all over the place. His last known location, however, was in Boro Park. The Psak against Moshe Stern was from the Rabbanut of Eretz Yisroel, signed by Rabbi Ezra Batzri and Rabbi Benyamin Levy and Rabbi Masoud El-Chadad.

The following links contain the biographical details of these three – with the link to the seruv.

<https://www.getora.org/yechiel-friedman>

<https://www.getora.org/david-nahmmany>

<https://www.getora.org/moshe-stern>



Yechiel Friedman



David Nahmmany



Moshe Stern

"These rallies worked. There are organizations and Rabbis that have worked for years and the Get has not come through. This Get came about by frum women on Instagram who have created a movement that has inspired the women you are seeing at these rallies," says Yechiel Y.

This person is clearly referring to Ora.

Others, however, have the opposite complaint. They complain about Ora's tactics saying that they violate halacha. A comment on a rival website expresses this very thought.

Ora, however, follows the advice of leading and nationally recognized Poskim.

"There is a debate among the Poskim regarding the parameters of what defines an improper get me'usa. Ora only publicizes the seruvim issued by the Beis Din and with their authorization to publicize it," explains Rabbi Yonatan Klayman, Director of Advocacy for Ora.

"It also makes a big difference if we are contacted early on. Ora works closely with the Batei Dinim, the Agunah and their legal representatives to make sure that everyone is on board with the process. The Beis

Din generally authorizes publicizing a seruv when, in their view, it would be impossible to obtain otherwise. That's why pressure implanted thoughtfully," remarks Keshet Star, CEO of Ora.

There is, of course, a downside sometimes to social media campaigns in that it can also backfire. How so? At times, a husband is almost in agreement to give a get and states that he will do so if his name is taken off certain websites and facebook pages. When something goes viral, however, this cannot happen. Therefore, it is extremely important to be in touch with the people that are working to obtain that get.

As this is a developing phenomenon, stay tuned for more rallies, and, hopefully, more Agunos set free. Oh, and Mazel Tov Elizabeth!

You can reach the writer at shmielsoiferman@gmail.com



flatbushgirl 9h



#FREEELIZABETH
#FREEALLAGUNOT



HELP FREE ELIZABETH! A
YOUNG WOMAN IN OUR
COMMUNITY WHO HAS
BEEN REFUSED A GET FOR
ALMOST 4 YEARS AND
NEEDS HER LIFE BACK!

#freeelizabeth

RALLY AT 10AM
THURSDAY MARCH 11TH

STARTING AT THE CORNER OF KINGS HIGHWAY
AND OCEAN AVE BY THE PARK

BRING POSTERS AND FRIENDS



Corporal Wiltshire Square



Join Me to Free Elizabeth!
Will you be there?!

Type something...

Send a response.

Send message



Page 1 of 1

Henry Hasson, MD

Assistant Professor of
Neurology and Pediatrics

2769 Coney Island Ave.
Brooklyn, NY 11235
www.hassonmd.com

718-785-9828 (phone)
718-425-0964 (fax)
henry@hassonmd.com

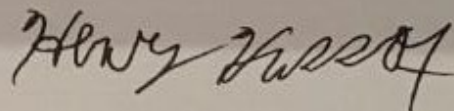
1/8/2016

RE: Elliott Hirsch

DOB: 08/01/1987

To whom it may concern,

Hirsch Elliot was seen in consultation today at my Neurology office. He has been diagnosed with ADHD. Due to his diagnosis, I recommend double time on his tests. If you have any questions, you may contact my office.



Henry Hasson, MD

Assistant Professor of Neurology and Pediatrics
Diplomate of the American Board of Psychiatry and Neurology
with special qualifications in Child Neurology, Clinical Neurophysiology



SCHOOL OF LAW
OFFICE OF ADMISSIONS

Seton Hall University

One Newark Center, Newark, New Jersey 07102-5210

Phone: (973) 642-8747

Toll Free: (888) 415-7271

Fax: (973) 642-8876

law.shu.edu

July 5, 2016

Mr. Elliot Hirsch
7 Saxony Drive
Oakhurst, NJ 07755 USA

Dear Mr. Hirsch,

Congratulations! It is my pleasure to offer you admission to Seton Hall University School of Law for the 2016 entering class, with the distinction of being awarded the *Distinguished Scholarship*. Distinguished scholarships are awarded to the most promising Seton Hall Law students and can be renewed annually as outlined in the attached scholarship agreement. Your academic achievements and outstanding personal attributes place you among a highly selective group of students who have been chosen to become the Class of 2019.

Seton Hall students take advantage of our strategic location and well-established reputation. Our curriculum encompasses rigorous course work with an emphasis on hands on learning through internships, clerkships and clinical programs. By every measure, Seton Hall Law's outcomes stand apart. New York and New Jersey bar passage rates consistently exceed state averages and our graduates' employment outcomes stand alongside the leading law schools in the region. Whether your professional goals take you to the fast-paced legal capital of New York City, the comfortable surroundings of suburban New Jersey or any major legal marketplace in the nation, you will be joining Seton Hall's proud base of over 12,000 alumni.

You will be surprised at all that Newark has to offer – an active student social scene, modern and convenient housing choices and world-class arts and entertainment. I invite you to pay us a visit and see for yourself!

Enclosed is important information regarding seat deposits and deadlines to make your commitment to attend Seton Hall Law and to reserve your seat in the 2016 entering class. Please read it carefully and contact us if you have questions or need assistance. Your seat deposit can be submitted electronically. Visit law.shu.edu/newstudent for details. Additionally, the Financial Aid Office has been notified of this offer of admission. If you have already applied for financial aid, an award notification will follow.

On behalf of Dean Kathleen M. Boozang and the Faculty Committee on Admissions, I congratulate you on your achievements. Seton Hall looks forward to offering you an unparalleled legal education from the heart of legal opportunity. I look forward to welcoming you this fall!

Sincerely,

Gisele Joachim
Dean of Enrollment Management

SETON HALL LAW

One Newark Center
Newark, NJ 07102-5210

Elliot Hirsch
Is Awarded a

*Congratulations
Elliot!*

Distinguished Scholarship (Full Tuition Scholarship)

To attend Seton Hall University School of Law beginning in Fall 2016

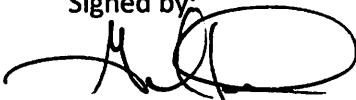
You will receive a full tuition scholarship for the 2016-17 academic years, evenly split between the fall and the spring semesters. You will remain eligible for this award for each of the second and third years, provided you remain in compliance with Seton Hall Law School disciplinary code.

The total of this tuition award and other tuition-restricted scholarships and/or tuition remission may not exceed the cost of tuition for any semester. This award covers tuition only. It does not cover other fees or educational expenses. The tuition award supersedes any prior offering of Presidential, Deans, Chancellor or Tuition Credit awards as a replacement (not an additional) award. The tuition award will only apply to the fall and spring semesters, and does not apply to study abroad, summer semesters, or any classes taken outside of Seton Hall Law. You must maintain continuous enrollment at Seton Hall Law as a full-time student. Additionally, the total of all tuition awards, tuition remission, scholarships, credits and other financial aid may not exceed the Financial Aid Cost of Attendance.

To accept this award, you must sign this certificate and return it to the Office of Admissions and electronically submit the required seat deposit by the deadline stated in your letter of admission. This award cannot be deferred or transferred to a future semester. Remember to keep a copy for your records.

Congratulations on this achievement! We hope that this award will enable you to attend Seton Hall University School of Law.

Signed by:



Gisele Joachim
Dean of Enrollment Management
July 5, 2016

I accept this scholarship and understand the terms & conditions.

Elliot Hirsch July 5, 2016

Badatz Btzedek Tishpoit
239 Foster Avenue
Brooklyn, NY 11230-2195



August 5, 2019

In the matter of Hirsch v Kairey

We the undersigned have been involved in the above matter from the early stages of the case. We originally pressured the parties to remove the matter from court and litigate all claims in Beis Din. It is of our opinion that this matter could have been resolved many times already. However, even after the issues were dealt with in another Beis Din that was involved, the wife continues to submit new claims to secular court. Unfortunately, this action has caused many delays in the settling of this matter. The Beis Din involved stands by idly without condemning the wife's behavior.

Now therefore, anyone who aids the wife in her offensive in secular court in any way, is considered a *מסייע לדבר עבירה* and is causing this case to drag on indefinitely.

It is our hope that the parties will come up with a mutually accepted agreement and they will each go their separate ways and continue on to build Jewish homes where their child will grow up in peace and tranquility.

May we all merit the final redemption and the rebuilding of the Beis Hamikdash speedily in our days.

To this we affix our signatures on the fourth day of the month of Menachem- Av in the year 5779.

Avrohom Kirsch

Rabbi Avrohom Kirsch, Dayan in the name of the Beis Din



Email Address: btzedektishpoit@gmail.com
Tel: 718-854-1512 Fax: 718-298-3166 Cell: 347-263-9696

**SUPREME COURT OF THE STATE OF NEW YORK
APPELLATE DIVISION: SECOND JUDICIAL DEPARTMENT**

ALAN D. SCHEINKMAN, P.J.
WILLIAM F. MASTRO,
REINALDO E. RIVERA,
MARK C. DILLON,
RUTH C. BALKIN, JJ.

In the Matter of the Application of

ELLIOT M. HIRSCH

TEMPORARY PRACTICE
AUTHORIZATION ORDER

for Authorization to Engage in the
Limited Practice of Law

Upon the application of Elliot M. Hirsch, dated September 22, 2020, and supplemental submissions dated September 24, 2020 and September 29, 2020, for an order authorizing the applicant to engage in the limited practice of law under the terms of the Temporary Authorization Program (the “Program”), it is

ORDERED that the applicant is temporarily authorized to engage in the practice of law, subject to the conditions and limitations set forth below:

1. The applicant shall work in the State of New York under the supervision of attorneys employed by the applicant’s employer. All supervising attorneys must be attorneys who are, and have been for at least three years, duly admitted to practice in the State of New York and members in good standing of the bar of the State of New York.

2. The applicant may perform, subject to the provisions and limitations of this Order, the functions of an attorney and counselor-at-law.

3. A supervising attorney shall be actually present to supplement or correct any written or oral statement, or any action of the applicant in all (1) examinations before trial and (2) cases in which the applicant appears before a court, except for routine calendar calls. If a supervising attorney is not available and present, the matter may not proceed. For routine calendar calls, a supervising attorney shall be immediately available to appear should the need arise. In all circumstances, the applicant’s appearance shall be on notice to the jurist before whom the appearance is made.

4. A supervising attorney must approve the final versions of all legal documents drafted by the applicant, and the supervising attorney’s name must appear thereon. Whenever a signature is required by

Part 130 of the Rules of the Chief Administrator of the Courts (22 NYCRR part 130), the paper shall be signed by a qualified supervisor.

5. The applicant may not open or maintain any attorney escrow account and may not be a signatory on any attorney escrow account.

6. The applicant may not finally dispose of any matter without the prior approval of a supervising attorney.

7. The applicant, in accordance with the limitations and conditions expressed in this order, is approved to appear before all courts of record in this State, except for the Court of Appeals and the Appellate Division, where appearances are permitted only with the prior approval of those Courts.

8. The applicant shall immediately notify this Court and any other appropriate Department of the Appellate Division if he or she is no longer eligible to participate in the Program.


And it is further

ORDERED that this order shall immediately expire if the applicant (1) does not sit for the Uniform Bar Examination (the "Exam") by August 2021; (2) fails the Exam or any other bar examination administered in New York or any other state or territory of the United States, or in the District of Columbia; (3) fails to submit a completed Application for Admission to the appropriate Department of the Appellate Division within four weeks of the publication of Exam results or promptly respond to any request for additional application materials; (4) is not admitted to the bar of the State of New York for reasons related to character or fitness to practice; or (5) ceases to be employed by the applicant's current employer; and it is further

ORDERED that otherwise, this order shall immediately expire upon the applicant's admission to the bar of the State of New York.

SCHEINKMAN, P.J., MASTRO, RIVERA, DILLON and BALKIN, JJ., concur.

ENTER:

A handwritten signature in black ink, appearing to read 'A D R', is written over a horizontal line.

ALAN D. SCHEINKMAN
Presiding Justice

Dated: October 8, 2020